

Nan Bernardo  
Attorney  
Writer's direct dial: (973) 426-6006  
Writer's fax (973) 426-3258  
Writer's email: [bernarn@basf.com](mailto:bernarn@basf.com)

May 1, 2003

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Ms. Kedari Reddy, Assistant Regional Counsel  
Office of Regional Counsel – Region II  
U.S. Environmental Protection Agency  
290 Broadway – 17<sup>th</sup> Floor  
New York, New York 10007-1866

**Re: Lower Passaic River Study Area**  
**Request for Information Pursuant to 42 USC §§9602-9675**  
**Addressed to BASF Corporation for Inmont Chemical Corp., 150 Wagaraw Road, Hawthorne, NJ**

Dear Ms. Reddy:

Enclosed please find BASF's Response to the above referenced Request for Information. As we have discussed, the former Inmont Chemical Corporation (Inmont) Site on 150 Wagaraw Road in Hawthorne has an extensive history of environmental investigation and remediation. Inmont purchased the Site in 1946. In 1979 United Technologies Corporation (UTC) purchased Inmont. Between 1982 and 1984 the New Jersey Department of Environmental Protection (NJDEP) required UTC to undertake certain environmental investigations at the Site.

In 1985 BASF Corporation (BASF) purchased Inmont from UTC. This triggered the ECRA process for UTC. Just prior to the sale, UTC entered into an Administrative Consent Order with the NJDEP obligating it to do an ECRA investigation and remediation. BASF closed its operations at the Site within one year, in 1986. BASF submitted an ECRA plan for the Site limited to decommissioning of the "continuing operations" which were not addressed by UTC's ECRA program. Investigation and remediation at the Site is still ongoing.

In addition, BASF and others were named defendant in two separate legal actions arising out of alleged groundwater contamination in Hawthorne Borough.

Thus considerable information and data has been developed which is potentially responsive to the Request for Information. Much of this information has been reviewed and provided in this Response. However, our investigation is ongoing. We anticipate supplementing this Response within the next several weeks.

Under §104(e)(2) of CERCLA, BASF has the option, upon reasonable notice, to grant access at all reasonable times, to a representative of the EPA, to inspect and copy all documents or records identified in the Response. Due to the comprehensive nature of this Response and the volume of documents identified we have chosen this option. The documents identified on the May 1, 2003 SOURCE OF INFORMATION and any amendments thereto are available for inspection, upon reasonable notice.

However we have included several documents with this Response. They are listed on the attached Exhibit A.

Very truly yours,

**844230001**



Nan Bernardo

EXHIBIT A

List of Documents Submitted with BASF's May 1, 2003 Response to EPA's Request for Information

**Map prepared by Lan Associates, Inc. in conjunction with Inmont/UTC's ECRA obligations, designated as M-3, "Sanitary and Storm Sewer Location Plan"**

**BASF Inmont-Hawthorne Plot Plan Drum Storage Areas**

**Articles of Incorporation, Amended and Restated Certificate of Incorporation, and By-Laws**

**Site History of the Former Inmont Facility prepared on May 29, 1992 prepared for United Technologies corporation.**

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**ATTACHMENT B**  
**REQUEST FOR INFORMATION**

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. Please provide the information requested below including copies of all available documentation that supports your answers

- 1) How long has your company operated at the facility? If your company no longer operates at this facility, during what years did your company operate at the facility?

**International Printing Ink Corporation was founded by merger of Ault & Wiborg Corporation, Queen City Printing Ink and Philip Ruston Inc. In 1937, International Printing Ink changed its name to Interchemical Corporation (Interchemical).**

**The Hawthorne Facility<sup>1</sup> was built in 1950 by Interchemical. Interchemical consolidated activities at the Hawthorne Site in 1950. The Interchemical plants consolidated were Aridye of Fair Lawn, Lyon's Piece and Dye, and Phoenix Dye Works of Patterson. The plant in Hawthorne was designed primarily for the manufacture of textile pigment dispersions, but with the further consolidation of corporate facilities, it began making dyestuffs for the textile industry. It eventually became the primary pigment and dyes manufacturing facility for Interchemical.**

**On April 15, 1969, Interchemical changed its name to Inmont Corporation, an Ohio corporation. On December 12, 1973, Inmont Corporation merged into MEW Corporation, a Delaware corporation, and simultaneously changed its name to Inmont Corporation (Inmont), a Delaware corporation.**

**In 1977, Carrier Corporation (Carrier) acquired Inmont. As part of Carrier, Inmont was acquired by United Technologies Corporation (UTC) in 1979.**

**On August 21, 1985, pursuant to a Stock Purchase Agreement, dated May 14, 1985, BASF American Corporation (BASF), and BASF Aktiengesellschaft (BASF AG), the "parent" of BASF, acquired the capital stock of Inmont from UTC. (Inmont Transaction) Included in**

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<sup>1</sup> The Facility subject to these Request is identified as "Inmont Chemical Corp., 150 Wagaraw Road, Hawthorne, NJ." It will be referred to in these Responses as the "Site", "Hawthorne Facility" and/or "Plant".

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**this Transaction was real property located at 150 Wagaraw Road, Hawthorne Borough, Passaic County, NJ.**

**Manufacturing operations at the Facility ceased in November 1986. From October 1992, until March 1994, a portion of the Facility was used as a warehouse for the storage of nylon printing plates.**

**BASF has fully decommissioned and dismantled the Facility. Currently, the Site exists as a substantially cleared and secure property with large portions either being paved or covered by former building slabs.**

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

- 2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes" please provide the years that your company held such a permit and its EPA Identification Number.

**The Facility operated two hazardous waste storage areas. These activities were regulated by RCRA. (EPA ID # NJD002165317). Inmont's permits for operation of the hazardous waste container storage and tank storage were transferred to BASF as part of the Inmont Transaction. BASF completed closure of the two RCRA units and requested formal closure approval and delisting of the RCRA activities on July 31, 1991**

**As of April 1, 1981 Inmont's Federal EPA ID Number was NJD 002-182-897. Its State EPA ID Number was NJD 002-182-897. Its State TSD Number was 2009C.**

- b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act 33 U.S.C. § 1251 et seq.? If "yes" please provide the years that your company held such a permit.

**Surface Water/Stormwater. The Facility was issued a New Jersey Pollutant Discharge Elimination System Discharge to Surface Water (DSW) Permit (NJPDES Permit #NJ0002453) on March 7, 1985 authorizing the discharge of non-contact cooling water to the waters of the State of New Jersey (Passaic River).**

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On August 4, 1994 BASF received a Final Revocation Notice based upon the NJDEP's determination that BASF has satisfied the requirements of NJPDES/DSW Permit No. NJ0002453. The NJDEP further advised that it will authorize the stormwater discharge from the Facility under a general permit for stormwater discharges to surface water, NJPDES Permit No. NJ0088315, issued August 5, 1995, with an effective date of October 1, 1994. This permit was terminated on February 7, 1997.

**Groundwater.** A Discharge to Groundwater (DGW) major modifications, to the then existing NJPDES permit, was issued to BASF on August 26, 1987. The modification was issued as a NJPDES DGW Closure/Post Closure Permit to satisfy the requirements of Section 7:26-9.2 of the New Jersey Hazardous Waste Regulations, which prohibits the use of underground hazardous waste tanks unless groundwater monitoring is performed. The DGW permit was finally revoked on March 1, 1995.

See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

- 3) Did your company receive, utilize, manufacture, discharge, release, store materials or dispose of any containing the following substances:

Based upon the investigation to date, BASF provides the following information.

SUBSTANCES	YES	NO
2,3,7,8 tetrachlorodibenzo-p-dioxin		
2,4- Dichlorophenoxy acetic acid (2,4-D)		
2,4, 5-Trichlorophenoxy acetic acid (2,4,5-T)		
2,4,5-Trichlorophenol (2,4,5-TCP) or other dioxin compounds	X	
Dichlorodiphenyl-trichloroethate (DDT)		
Benzene	X	
Ethyl benzene	X	
Total Petroleum Hydrocarbons (TPEH)	(1A) (1B)	
Polyaromatic Hydrocarbons (PAH)	(1A)	
If "yes" please list specific compounds.	(1B)	
Toluene	X	
Xylene	X	

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PCBs	X	
Antimony		
Argon		
Arsenic		
Cadmium		
Chlorine		
Chromium	X	
Copper	X	
Iron		
Lead	X	
Mercury		
Nickel		
Silver		
Sulfur		
Titanium		
Vanadium		
Zinc		
Cyanide		
Acetone		
Acetylene		
Acetylene tetrabromide		
2 butoxy ethanol		
Bis (2-ethylhexyl) pthalate	(2)	
Chlorodifluoromethane	X	
Chloropentafluoromethane		
Chlorotrifluoromethane		
Dibutyl phthalate		
Dichlorodifluoromethane		
Naphtha		
Silver nitrate		
Sodium bisulfide	X	
Sodium hydroxide	X	
Sodium nitrate		
Tungsten		

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(1A) The following is an inventory of Raw Materials that contained hazardous substances as reported in 1985:

SUBSTANCE	HAZARDOUS COMPONENT
Anhydrous Sodium Bisulfite	Sodium Bisulfite
Aluminum Sulfate Iron Free	Aluminum Sulfate
Hydrochloric Acid	Hydrochloric Acid
Acetic Acid	Acetic Acid
Aqua Ammonia	Ammonia
Sodium Hydroxide	Sodium Hydroxide
Dichlorobenzidine	Dichlorobenzidine
Sodium Nitrite	Sodium Nitrite
Citric Acid	Citric Acid
Manganese Octoate	Petroleum Hydrocarbon
Spurso	Petroleum Hydrocarbon
6% Rare Earth Neodecanate	Petroleum Hydrocarbon
Schercoquat DAB	Methanol
Mineral Oil G/S Phthalo Blue	Petroleum Hydrocarbon
H.S. 470 Phthalo Blue	Petroleum Hydrocarbon
Oil No. 996	Petroleum Hydrocarbon
C.P. Primrose Yellow	Lead, Chrome
Chrome Yellow Medium	Lead, Chrome
Molybdate Red Orange	Lead, Chrome
Grinding Vehicles 100s	Petroleum Hydrocarbon
Arofene 8318 Flakes	Formaldehyde
Magie 500 Oil	Petroleum Hydrocarbon
Magie 470 Oil	Petroleum Hydrocarbon
Gulf Oil No. 896	Petroleum Hydrocarbon
Magiesol 47	Petroleum Hydrocarbon
Xylol	Xylene
Hi Sol 400	Petroleum Hydrocarbon
Heliogen Blue	Copper Compound
Caustic Flake	Sodium Hydroxide
Bleach Solution	Sodium Hydroxide
Copper Sulfate	Copper Sulfate
Barium Chloride Crystal	Barium Chloride
Phthalo Blue Crude 92%	Copper Compound
Nevroz 1520, 60% 47 Magiesol	Petroleum Hydrocarbon
Aerosol C-61	Isopropyl Alcohol

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<b>Nalkylene 500</b>	<b>Petroleum Hydrocarbon</b>
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(1B) The following is an inventory of Final Products that contained hazardous substances as reported in 1985:

<b>FINAL PRODUCT</b>	<b>HAZARDOUS SUBSTANCE</b>
470 Speed HSHG AAA Diarylide Yellow	Petroleum Hydrocarbon
500 Speed HSHG AAA Diarylide Yellow	Petroleum Hydrocarbon
470 Speed HSHG Lithol Rubine	Petroleum Hydrocarbon
500 Speed HSHG Red Lake C	Petroleum Hydrocarbon
Mineral Oil Red Lake C	Petroleum Hydrocarbon
Mineral Oil Diarylide Yellow	Petroleum Hydrocarbon
47 DEO HS Lithol Rubine	Petroleum Hydrocarbon
47 DEO HS Transparent Yellow	Petroleum Hydrocarbon
52 DEO HS AAA Yellow	Petroleum Hydrocarbon
PMS AAA Yellow	Petroleum Hydrocarbon
PMS Red Lake C	Petroleum Hydrocarbon
PMS Red Lake C	Petroleum Hydrocarbon
R. R. Donnelley Phthalo Blue	Copper Compound Petroleum Hydrocarbon
47 DEO HS Phthalo Blue	Copper Compound Petroleum Hydrocarbon
470 Speed HS Phthalo Blue	Copper Compound Petroleum Hydrocarbon
PMS Transparent AAA Yellow	Petroleum Hydrocarbon
52 DEO HS Transparent Yellow	Petroleum Hydrocarbon
Phthalocyanine Blue Water Dispersion	Copper Compound

(2) See infra. During Inmont's 1982 groundwater sampling activities a tar like material was observed in the discharge of Well RW2. Sampling analysis reported bis (2-ethylhexyl) phthalate. Inmont suggested that the tar like substance was from a source that predated its purchase of the Site.

See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

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4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3) were a product or by-product.

**Past operations consisted of the production of dyestuffs, dyestuff intermediates, pigment intermediates, specialty polymers and chemicals. Organic chemical production was discontinued in 1967 and dyestuff production was discontinued in 1974. After 1974, operations consisted of the manufacturing of pigments, aqueous dispersions, and flush bases.**

**The products which were manufactured during the course of the plant's history varied widely and changed regularly. The processes changed accordingly. Production at the Facility ceased in November 1986.**

**Initially the Facility consisted of two production wings, one for pigment and dyestuff production (Building 6) and one for pigments (Building 4), anchored at the base with a warehouse (Building 3). Laboratories and offices (Buildings 1 and 2) acted as a facing for the warehouse.**

**As of the early 1980s the Facility was divided into separate buildings or building areas. (See attached Map prepared by Lan Associates, Inc. in conjunction with Inmont/UTC's ECRA obligations, designated as M-3, "Sanitary and Storm Sewer Location Plan".)**

BUILDING NUMBER	UTILIZATION
1	Offices
2	Laboratories
3	Raw Material, Intermediates Storage and Maintenance
4	Pigment dispersions; Finished Bases and Pigment Packing
5	Intermediates (built in 1966/demolished in 1978)
6	Pigment Synthesis and Filtration
6A	Presscake Pigment Drying
7	Pigment Milling, Drying, Blending and Packaging
8	Boiler House
9A	Ink Dispersions
9B	Employee Services
10	Main Electrical Service
11	Sub-Electrical Services
12	River Water Pump
13	Gravity Sprinkler Tank
17	River Water Pump House
18	River Water Filter House
22	Vacuum Pump
24	Surplus Equipment Storage and former maintenance shed
25	Pilot Laboratory
27	Varnish Tank Storage

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30	Finish Base Products, Warehousing and Shipping
31	Ice Plant

## **BASF'S OPERATIONS**

**BASF's operations at the Plant were based on the synthesis of azo pigments and processing of phthalocyanine blue pigment. The azo compounds, which can be yellow, orange or red, were formed by coupling monazo or diazo compounds, with coupling components such as naphthols or arylides. Blue phthalocyanine pigments were dispersed in organic systems. All reactors were constructed of rubber lined carbon-steel, stainless steel or fiber reinforced plastic varying in size from 500 to 13,000-gallons.**

**Azo pigments were synthesized at the Hawthorne Facility in the form of aqueous slurries. Various manufacturing steps such as filtration, concentration, drying, post drying, blending, milling and/or flushing were applied to the raw pigment slurry, depending on the pigment product application. The Facility also formulated and produced water-based dispersions using purchased blue pigments.**

**The following general procedure was used in pigment synthesis. The azo reactors were loaded with: hydrochloric acid, sodium nitrite, and a primary amine such as dichlorobenzidine (DCB). The resulting azo compounds were then transferred to the coupling reactors, which were previously charged with sodium hydroxide, a coupling agent such as acetoactanilide and in some cases acetic acid as a buffer for the coupling agent. Here in the coupling reactor, the azo compound reacted with the coupling agents and formed an insoluble pigment which precipitated out of solution. The manner in which azo compounds combined with the coupling agents varied. The other process conditions, such as temperature and pH, were also variable at each stage of the synthesis. Steam and ice were used to control temperature.**

**In the synthesis of diarylide yellow pigment, trace quantities of 3,3 dichlorobiphenyl, a biodegradable PCB, were produced by completing reactions. The PCB levels in the pigment were monitored and found to be below federal allowable levels.**

**All of the reactors identified above were vented to a scrubber. The scrubber water discharged to the plant's process sewers. In the scrubber from the DCB process tanks, the scrubber water was tested and treated, if necessary, to remove DCB prior to discharge to the POTW.**

**Aqueous pigment slurries were filtered via plate and frame filter presses. The aqueous effluent and wash water was discharged to the POTW via the process sewers. The presscake was collected in drums or carts and then sent to other areas for further processing.**

The pigment presscake was dried using belt driers and/or tray driers for this operation. In some cases the belt driers were used as a first step to dry the pigment with tray driers being used to dry off residual water. The dried pigment was blended and packaged for shipment. Operations which generated dust were vented through a dust collector.

To form water dispersion, presscake was dispersed in diluted ammonia and surfactant. This process was vented to a scrubber. The scrubber liquid was discharged to the POTW. The diluted dispersion was sent to a concentrator which removed excess water and discharged it to the POTW. The concentrated pigment dispersion was packaged in drums.

Flushed pigment concentrates were made by flushing presscake into a varnish base. Dough mixers (also called sigma blade mixers) were used to mix the varnish with presscake. The water associated with the presscake was released as the pigment dispersed in the varnish. During the process, the mixer was periodically tilted and water drained to the POTW. Vacuum was then applied to remove remaining water with the resulting pigment concentrate being drummed. Xylene was used to clean this equipment when necessary. The dirty solvent was stored in the underground hazardous waste tank.

Blue dispersions were prepared by mixing purchased phthalocyanine blue crude pigment with surfactants and water and dispersing this mixture in grinding mills. The blue dispersions were packed in drums.

Pigment synthesis and filtration were performed in Building 6. Water based pigment dispersion were prepared in this area as well. Within Building 6 were two separate sunken production areas where pigments were manufactured. At the bottom of each of these sunken areas were sump pits that were fed by an underlying collection system. Spills, leaks and washdown within the pit areas were directed to these sumps and pumped up to floor level by sump pumps. After being pumped out of the sumps, this discharge was directed to the process sewers which discharged to the POTW.

Presscake drying, milling, packaging and the blending of dry pigments occurred in Building 6A and 7.

Building 4 was used for the preparation of pigment flushes. Within Building 4 were triple balance scale pits that accumulated a hardened polymer-like material. Though not intentionally designed to act as a collection basin, they had functioned in this capacity over time. Building 4 also contained designated floor drains in addition to the scale pits.

The floor of the Plant were washed down, as required. All floor and trench drains in the manufacturing areas flowed to the process sewer, where it was eventually combined with plant sanitary waste. There were manufacturing and storage operations carried out in the following building with each production area having a floor drain system that discharged to

the process sewer: 4, 6, 6A, 7, 9A, 25, 30, 31. The surrounding yard area, either paved or unpaved, also contained drains; however, these drains were for storm runoff. There was no septic system at the Facility. Non-contact cooling water was discharged to the Passaic River. The discharge point was regulated by a NJPDES Permit NO. NJ 0002453. Stormwater runoff, from much of the plant, was also discharged this point.

### INMONT/UTC OPERATIONS

The following processes, as described in UTC/Inmont's Initial ECRA Notice were carried out by UTC/Inmont at the Facility.

As of September 1985 the Facility manufactured pigments from a range of intermediates of varying complexity. The Facility also produced aqueous dispersions and flush bases from these pigments.

Yellow and red pigments were synthesized in the form of aqueous slurries. Various manufacturing steps such as filtration, concentration, drying, post drying, and/or flushing were applied to the raw pigment slurry. The subsequent manufacturing steps were dependent on the pigment product application.

Blue pigment was not synthesized at Hawthorne. However the Plant did formulate water-based dispersions using purchased pigments. The following general procedure was used in pigment synthesis. The azo reactors were loaded with: hydrochloric acid, sodium nitrite, and a primary amine such as dichlorobenzidine and C-amine. The resulting azo compounds were then transferred to the coupling reactors. There the azo compounds reacted with the coupling agents and formed an insoluble pigment which precipitated out of solution. The manner in which azo compounds combined with the coupling agents varied. The other process conditions, such as temperature and pH, also varied along each state of the synthesis. Steam and ice were used to control temperature.

In the synthesis of diarylide yellow pigment, trace quantities of 3,3 dichlorobiphenyl, a biodegradable PCB, could have been produced by competing reactions. The PCB levels in the pigment were monitored and were reported to be well below the federal allowable levels.

All of the reactors noted above were vented to a scrubber. The scrubber water discharged to the plant's sanitary sewer.

Aqueous pigment slurries were then filtered generally via plate and frame filter presses. The water effluent was discharged to the sanitary sewers. The presscake was collected in drums or carts and then sent to other areas for further processing.



Much of the pigment presscake was dried. Belt driers and tray driers were used for this operation. The belt driers were normally used as a first step to dry the pigment. The tray driers were used to drive off residual water. The dried pigment was blended and packaged for shipment. Operations which generated dust (i.e. belt drier, pigment blenders, pigment loading/unloading area) were vented through a dust collector.

To form water dispersions, presscake was dispersed in ammonia and varnish. This process was vented to a scrubber. The scrubber liquid was discharged to the sanitary sewers. The dilute dispersion was sent to a concentrator which removed excess water and discharged it to the sanitary sewers. The concentrated pigment dispersion was packaged in drums.

Flush pigment concentrates were made by flushing presscake with a varnish base. Dough mixers (also called sigma blade mixers) were used to mix the varnish with presscake. The water associated with the presscake was released as the pigment was dispersed in the varnish. During the process, the mixer was periodically tilted and water drained to the sanitary sewer. Vacuum was then applied to remove remaining water, the resulting pigment concentrate was drummed. Xylene was used to clean this equipment when necessary. The dirty solvent was stored in an underground hazardous waste tank.

Blue dispersions were prepared by mixing purchased phthalo cyanine blue pigment with surfactants and water and dispersing this mixture in grinding mills. There blue dispersions were packed in drums.

Pigment synthesis and filtration occurred in Building 6. Water-based pigment dispersions were prepared in this area.

Presscake drying and the blending of dry pigments occurred in Building 6A and 7.

Building 4 was used for the preparation of pigment flushes.

The floors of the plant were washed down, as required. All floor and trench drains in the manufacturing area flowed to the sanitary sewer, along with plant sanitary waste. There was no septic system at Hawthorne. Non-contact cooling water was discharged to the Passaic River. The discharge point was regulated by an NJPDES permit. Stormwater runoff, from much of the plant, was discharged through this point.

#### **INMONT'S HISTORICAL OPERATIONS**

The Hawthorne Facility produced a broad range of dyestuffs, dyestuff intermediates, pigment intermediates, specialty polymers and chemicals which were discontinued when Inmont sold its dyestuff business to Sandoz in 1974 and its organic chemicals division to Aceto Chemical in 1967. Most of this activity took place in Building 5 which has since been razed.

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**The products manufactured in Building 5 included Vat Yellow, Phthalo Cyanine Blue Crude, Dioxazine Violet Crude, Phthalocyanine Green Crude, Brown Y Pigment and Quinizarin. The processes were as follows:**

PIGMENT	REACTION	SOLVENT	SOLVENT RECOVERY	BY PRODUCT
Vat Yellow	1-Amino anthraquinone was reacted with phthalyl chloride in nitrobenzene solvents.	Nitrobenzene. Methanol for wash. Sodium hydroxide solution for neutralization.	Methanol stripping, to holding tank. Vacuum distillation of nitrobenzene to storage tank. Still bottom residues.	Hydrogen chloride to alkaline scrubber, batch washed with sodium hydroxide, salt to sewer.
Phthalo Cyanine Blue Crude	Condensation of phthalic anhydride, urea, with copper chloride, and ammonium molybdate as catalyst in trichlorobenzene.	Trichlorobenzene. Methanol.	Methanol stripping followed by vacuum stripping of trichlorobenzene in glass kettle or rotary vacuum dryer.	
Dioxazine Violet Crude	2-Amino ethyl carbazole was reacted with chloranil in ortho dichlorobenzene	Ortho dichlorobenzene. Methanol for wash.	Methanol stripping and vacuum distillation of ortho dichlorobenzene in a glass kettle.	
Phthalocyanine Green Crude	Copper phthalocyanine crude blue was chlorinated in a molten flux of anhydrous aluminum chloride and salt. The molten mass was drowned out in dilute hydrochloric acid. The product was isolated in a rubber plate and frame filter press.			Dilute aluminum chloride solution was sent to the POTW after lime neutralization.
Brown Y Pigment	Diazotize aniline, coupled into beta naphthol and precipitated as a copper salt in a water slurry.			Copper sulfate which is converted to copper hydrate and discharged into the POTW.

INTERMEDIATES AND COLORLESS COMPOUNDS	REACTION	SOLVENT	SOLVENT RECOVERY	BY PRODUCT
Quinizarin: 1,4 Dihydroxy anthraquinone	Friedel Crafts condensation of phthalic anhydride para-chlorophenol.	Sulfuric acid and oleum.		Sulfuric acid, phthalic acid to POTW after lime neutralization.
MAPO: methyl aziridenyl phosphine oxide	Condensation of phosphorous oxychloride with propylene imine (2-methyl aziridine) in methylene chloride and aqueous sodium hydroxide.	Methylene chloride and aqueous sodium hydroxide.	Methylene chloride via film evaporator.	Salt solution, sodium hydroxide, to POTW.
MAPC: 3-Amino, 4 methyl benzamide	Step 1: Nitration of 4-methyl benzoic acid to 3-nitro-4-methyl benzoic acid.	Sulfuric acid.		Effluent - Dilute sulfuric and nitric acid to POTW after lime neutralization.

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	Step 2. Conversion to 3-nitro, 4-methyl benzamide.	Thionyl chloride in toluene.	Toluene recovery via vacuum strip from glass lined kettle. Immerse into dilute ammonium hydroxide in rubber lined tank. Filter off product with rubber plate and frame press.	Hydrochloride and sulfur dioxide to alkaline scrubber.
	Step 3. Reduction to 3-amino 4-methyl benzamide.	Dilute hydrochloric acid with iron dust in a rubber lined steel tank	The iron was filtered off from the water solution, and the product salted out.	
Iso Propylamine Sulfate	Isopropanol amine to form the sulfo-amine acid ester	Sulfuric acid in toluene	Toluene recovered by filtration	

DYESTUFF	REACTION	SOLVENT	SOLVENT RECOVERY	BY PRODUCTS
AR Series	2-Amino, 6-nitro benzthiazole coupled with phenyl, diethanol amine derivatives.	Phosphoric Acid. Methyl alcohol later hydrochloric acid.		Phosphoric acid/methyl alcohol to POTW.
Styrene Acrylate	Styrene. Acrylic Acid.	Isopropanol. Water. Amonia.	Isopropanol.	
Iron Oxide Slurry	None- physical process.	Water.		

Quinizarin (1,4 dihydroxyanthraquinone) was the largest volume dyestuff intermediate. The major dyestuffs manufactured were the AR series. Vat yellow and phthalo crude were the major pigments produced in Building 5. The largest volume product was styrene-acrylate.

Many of the products produced in Building 5 generated acidic effluents that were neutralized with lime before discharging to the process sewer.

Quinizarin blue dyes, fluorescein, eosine and copper 8 hydroxyquinoline were the major discontinued products that were made in Building 6. Fluorescein was manufactured by reaction between resorcinol and phthalic anhydride in zinc chloride. Eosine was prepared by brominating fluorescein in methanol. The dyes were prepared by a condensation reaction between quinizarin and selected amines.

See attached Site History of the Former Inmont Facility prepared on May 29, 1992 prepared for United Technologies Corporation.

b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?

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See response to Request 4 a), above.

Hazardous Substance	Use	Other
PCBs	<p>In the synthesis of diarylide yellow pigment, trace quantities of 3,3 dichlorobiphenyl, a biodegradable PCB, were produced by completing reactions.</p> <p>Before 1977 phthalo blue was manufactured at the Facility. Its manufacture produced a PCB byproduct as a result of solvent decomposition.</p>	
PCBs	<p>It was reported in 1988 that there were sixteen PCB containing transformers and three PCB containing switches at the Facility. Based upon the historical background data and soil sampling in the Building 10 Transformer Area, it appeared that historical PCB oil handling practices resulted in PCB soil contamination.</p>	
Xylene	<p>Xylene was used at the Facility for cleaning purposes.</p> <p>Xylene was used to clean the dough mixers (sigma blade mixers) used in pigment manufacturer. Xylene was used to clean this equipment when necessary. The dirty solvent was stored in underground hazardous waste tank.</p> <p>Xylene was used as a flush base cleaning agent in Building 4.</p>	
Lead chromates	<p>Lead chromates were used in building 9a for printing ink dispersions.</p>	
Copper	<p>Copper complexes were produced during the Korean War.</p>	
Nitrobenzene	<p>Nitrobenzene was added as a solvent to the reactor in Building 5 as part of the pigment manufacture</p>	

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	of vat yellow.	
<b>Toluene</b>	<p>Toluene was used in small quantities as a solvent, a cleaning agent for the flush base.</p> <p>Toluene may also have been used as a solvent in some reactions in Building 5.</p>	
<b>Chromium</b>	<p>Chromium was contained in pigments brought into the Facility in conjunction with textile operations.</p>	
<b>Benzene</b>	<p>Benzene was used as a solvent in laboratory quantities.</p>	
<b>Styrene</b>	<p>Styrene was used in Building 5 until 1977.</p>	
<b>Bis (2-ethylhexyl) phthalate</b>	<p>Bis (2-ethylhexyl) phthalate was used in textile printing.</p> <p>During Inmont's 1982 sampling a tar like material was observed in the discharge of Well RW2. Inmont suggested that this substance and other characterized dyestuffs whose origin pre-dates its purchase of the Site.</p>	
<b>Tetrachloroethylene</b>	<p>Tetrachloroethylene was used as a dry cleaning solvent.</p>	
<b>Chlorodifluoromethane</b>	<p>Freon tanks were used in the Ice Plant</p>	
<b>Other Dioxin Compounds</b>	<p>The Facility's filter house building contained four horizontal tanks filled to their midpoint with filter material consisting of homogeneous filter gravel and solidified Passaic River silt material. The filter tanks were used to filter water used for cooling. An analysis performed for tank decommissioning found low levels of hexachloro dibenzo-p-dioxin, heptachloro dibenzo-p-dioxin, octochloro dibenzo-p-dioxin, pentachloro dibenzo-p-furan, hexachloro dibenzo-p-furan in the filter gravel and solidified river silt material.</p>	

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- i) Describe the chemical composition of these hazardous substances.

**See infra.**

- ii) For each process, what amount of hazardous substances was generated per volume of finished product?

**The only information discovered to date reports that for 1984 it was estimated that the Facility generated 84,000 pounds of hazardous waste (xylene).**

- iii) **Were** these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

**See infra.**

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

- 5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

- a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

Kenneth C. Koneval	Manager of Environmental Affairs BASF
Walter Mock	Senior Processing Engineer Inmont Site Manager – Hawthorne BASF
Philip R. Arvidson	Vice-President Environmental Affairs Inmont Director – Environmental Audits
Augustus Gagis	Hawthorne Plant Manager Inmont Hawthorne Plant Manager BASF

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Walter F. Hanzl	Director of Environmental Compliance Inmont Manager Process Engineering BASF
David L. Kuta	Director of Waste Management Inmont
Paul Mock	Senior Process Engineer Inmont
Alfred F. Schneid	Technical Manager Inmont
Dale Webster	Manager Site Remediation BASF
James Coscia	Production Manager Inmont

- b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

In 1979 and 1980 waste solvent was removed from the Facility by SCA Chemical Services Co. Earth Division, 100 Lister Avenue, Newark, NJ.

Hazardous Waste Disposal by BASF in conjunction with its demolition/decommissioning of the Facility included:

HAZARDOUS WASTE STREAM	ESTIMATED QUANTITY	DISPOSAL FACILITY
General building waste composed of plugged lines, lab equipment, ductwork, miscellaneous equipment, acid bricks, Building 7 concrete	4,000 cubic yards	Chemical Waste Mgmt. Emelle, Alabama
Sulfuric acid residue	7 cubic yards (23 drums)	Chemical Waste Mgmt. Emelle, Alabama
Drain sludge/solids	54 cubic yards (200 drums)	Thermalkem Inc. Rockhill, SC
Drain liquids	60,000 gallons	Solvent Recovery Svcs. of Linden NJ Linden, New Jersey
Building #30 Ink	7,000 gallons	Solvent Recovery Svcs. of Linden NJ Linden, New Jersey
Hydropneumatic tank liquid	4,000 gallons	Chemical Waste Mgmt. Newark, New Jersey
PCB ballasts and transformers with oil	500 gallons	PPM/USPCL Philadelphia, PA
Varnish pit sludge	13 cubic yards (43 drums)	ENSECO

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		El Dorato, AR
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**Solid waste was removed from the Facility in drums. All liquid waste was pumped into a tanker for removal. The available records provide the following information:**

Date	Waste	Transporter	Disposal Location
1977	Liquid waste, Red Label and contaminated materials		Scientific Chemical, Newark for incineration
March 1979	Solvent Wash	Earthline Company 100 Lister Avenue Newark, NJ 07105	
December 1979	Waste Solvent	SCA Chemical Services 100 Lister Avenue Newark, NJ 07105	
February 1980	Waste Solvent	SCA Chemical Services 100 Lister Avenue Newark, NJ 07105	
March 1980	Waste Xylene Solvent	SCA Chemical Services 100 Lister Avenue Newark, NJ 07105	
April 1980	Waste Xylene Solvent	SCA Chemical Services 100 Lister Avenue Newark, NJ 07105	
May 1980	Waste Solvents	SCA Chemical Services	
July 1980	Waste Xylene Solvent	SCA Chemical Services 100 Lister Avenue Newark, NJ 07105	
August 1980	Sludge	Oswald Sewer Service 161 East Road Belford, NJ 07718	
1980	Organic solvent/sludge	Kisko	SRS Linden, NJ
1980	Organic solvent/sludge	SCA	Earthline Division SCA Services Newark, NJ
1980	Waste from sump pits and process sewers	Oswald Sewer Service	
1982 Generator's Annual Report	Waste solvent with pigment sludge	Not recorded	Solvents Recovery Services 1200 Sylvan St Linden, NJ
1982 Generator's	Oil & water	Not recorded	B&L Oil Frelingheuyzen

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<b>Annual Report</b>			<b>Newark, NJ</b>
<b>1982 Generator's Annual Report</b>	Oil & water	Not recorded	Nobel Oil Co. Rte. 206 Vincentown
<b>1982 Generator's Annual Report</b>	Oil & water, hazardous waste	Not recorded	S&W Waste 53 Pennsylvania Ave. South Kearny, NJ
<b>1983 Generator's Annual Report</b>	Solvent waste	Narrows Carrier	Solvents Recovery Services Linden, NJ
<b>1983 Generator's Annual Report</b>	Solvent waste	Continental Carriers	Solvents Recovery Services Linden, NJ
<b>1983 Generator's Annual Report</b>	Oil, petroleum; solid hazardous waste	Olsen & Hassold	S&W Waste Inc. South Kearny, NJ
<b>1983 Generator's Annual Report</b>	3 transformers with PCB Oil	S. J. Transporter	General Electric Co. Philadelphia, PA
<b>1983 Generator's Annual Report</b>	Flammable Liquid NOS, Waste Poison – B-solid NOS, Flammable liquid corrosive, Oxidizer Poison NOS, Corrosive liquid NOS, Corrosive Solid NOS, Poison B liquid	E.T.C.	AETC Flanders, NJ
<b>1983 Generator's Annual Report</b>	Picric Acid, Flammable Solid NOS, flammable liquid NOS	Emergency Tech. Service Corp.  [Nan, both this and above, "E.T.C." have the same address "Goldmine Road in Flanders"]	AETC Flanders, NJ
<b>1983 Generator's Annual Report</b>	Picric Acid, Flammable Solid NOS, flammable liquid NOS	Emergency Tech. Service Corp.  [Nan, both this and above, "E.T.C." have the same address "Goldmine Road in Flanders"]	AETC Flanders, NJ
<b>1984 Generator's Annual Report</b>	Waste solvent (xylol)	Continental Carriers	Solvents Recovery Services 1200 Sylvan St Linden, NJ
<b>1984 Generator's Annual Report</b>	Solvent waste m/ pigment sludge	Continental Carriers	Solvents Recovery Services 1200 Sylvan St Linden, NJ
<b>1984 Generator's</b>	Solvent waste m/ pigment sludge	Narrows Carrier	Solvents Recovery Services

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Annual Report			1200 Sylvan St Linden, NJ
1985	Waste Solvent	Continental Carrier	Solvents Recovery Services Linden, NJ
January 1985	Hazardous Solids – contains Lead	D&J Transportation Specialists	CECOS International Niagara Falls, NY
1985	Nitrobenzine	Rollins Environmental	Rollins Environmental Bridgeport, NJ
1985	Nitrobenzine	Delaware Container	Delaware Container Coatesville, PA
1985	Nitrobenzene	Freehold Cartage	EI DuPont Chambers Works Deepwater, NJ
1985	Waste Solvent	Narrows Carrier	Solvents Recovery Services Linden, NJ
1985	Waste PCBs	Chicago Industrial Waste Haulers	PCB Inc. of Missouri Kansas City, MO
1985	Liquid Varnish	S&W Waste Inc.	S&W Waste Inc. South Kearny, NJ
1986	Varnish, Presscake, glass jars of flush base, pigment, terepene solvent, latex tank residue, dust-pigment, Phath. Blue PC, Filters – dried pigment	Kramer	Chem Met, Wyandotte, MI
1986	Pigments, flush base, press cake, glass-flush base, Dry Resin Flakes, Pit Sediment, dried filters, dust pigment. Latex tank residue	Kramer	Wayne Disposal Belleville, MI
1986	Xylol	Kramer	Marisol Middlesex, NJ
1986	Dyes/Resins. Package lab chem	Kramer	Radiac Research Brooklyn, NY
1986	Mixed solvents (sludge tank)	SRS, Inc	Solvents Recovery Services Linden, NJ
1986	PCB transformers	AETCE	AETCE Kansas City, MO
1986	Combustible Liquid	Atlas Associates	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Flammable Liquid	Atlas Associates	Radiac Research Corp 261 Kent Avenue

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			Brooklyn, NY 11211
1986	Waste poisonous	Atlas Associates	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Corrosive Solid Waste	Amer. Indus. Marine	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Flammable liquid waste	Amer. Indus. Marine	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Flammable Liquid waste	Amer. Indus. Marine	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Oxidizer Waste	Amer. Indus. Marine	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1986	Combustable Liquid Waste	Atlas Associates	Marisol, Inc. 125 Factory Lane Middlesex, NJ 08846
1986	Waste Oil	Atlas Associates	Marisol, Inc. 125 Factory Lane Middlesex, NJ 08846
1986	Flammable Liquid Waste	Nappi Trucking	Marisol, Inc. 125 Factory Lane Middlesex, NJ 08846
1986	Flammable Liquid Waste	Atlas Associates	Marisol, Inc. 125 Factory Lane Middlesex, NJ 08846
1986 Generator's Annual Report	Spent sulfuric Acid	Applied Refine. Service	El DuPont Chambers Works Deepwater, NJ
1986 Generator's Annual Report	Combustible liquid, Flammable liquid, Waste Poison	Atlas Assoc	Radiac Research Corp 261 Kent Ave Brooklyn, NY
1986 Generator's Annual Report	Corrosive Solid Waste; Hazard Sub. Solid. Flammable liquid waste, Oxidized water	Amer. Indus. Marine	Radiac Research Corp 261 Kent Ave Brooklyn, NY
1986 Generator's Annual Report	Flammable liquid waste, Combustible liquid waste, waste oil	Atlas Assoc	Marisol Inc 125 Factory Lane Middlesex, NJ
1986 Generator's Annual Report	Flammable liquid waste	Nappi Trucking	Marisol Inc 125 Factory Lane Middlesex, NJ
1986 Generator's Annual Report	Spent sulfuric acid waste	Freehold Cartage	El DuPont Chambers Works Deepwater, NJ
1986	Corrosive liquid waste	Freehold Cartage	El DuPont

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Generator's Annual Report			Chambers Works Deepwater, NJ
1986 Generator's Annual Report	Flammable liquid waste	Zydinsky Environ. Serv.	Delaware Container W 11 <sup>th</sup> Ave & Valley Rd Coatesville, PA
1986 Generator's Annual Report	Flammable liquid waste	Continental Carriers	Solvents Recovery Services 1200 Sylvan St Linden, NJ
1986 Generator's Annual Report	Flammable liquid waste	Nappi Trucking	Environment Waste Res. 130 Freight St Waterbury, CT
1987	Flammable waste Liquid, NOS	Atlas Associates	Marisol, Inc. 125 Factory Lane Middlesex, NJ 08846
1987	Solidified amines	Atlas Associates	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1987	Waste Aniline Oil	Atlas Associates	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1987	Waste Styrene Monomer	Atlas Associates	Radiac Research Corp 261 Kent Avenue Brooklyn, NY 11211
1987	Packaged Lab chemicals	Haz Mat Environmental	Battery Disposal Technology 4255 Research Parkway Clarence, NY 14301
1987	Waste Liquid Imidazolines	American Ind. Marine	Chem-Met Svcs 18550 Allen Road Wyandotte, MI 48192
1987	BSC aliphatic diamine	American Ind. Marine	Chem-Met Svcs 18550 Allen Road Wyandotte, MI 48192
1988	Hazardous waste, Liquid Xylene 0.2%; ethylbenzene – 0.06%	Freehold Cartage Inc.	Solvent Recovery Service of NJ Linden, NJ
1989	RQ 100 Waste Corrosive Solid,	Freehold Cartage, Inc.	Chemical Waste Management Emelle, Alabama

c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

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There were sixteen aboveground tanks existing at the Facility. These tanks and their contents, as of August 1987, are summarized below:

#### ABOVE GROUND STORAGE TANK SUMMARY

##### HAZARDOUS SUBSTANCE STORAGE

SIZE (GALLONS)	DESCRIPTION	LOCATION
60,000	No. 6 Fuel Oil, diked, approximately 14,000-gallons remain serving the boiler house (Building 8)	East of Building 27
60,000	No. 6 Fuel Oil, diked, approximately 14,000 gallons remain serving the Boiler House (Building No. 8)	East of Building 27
15,000	Sulfuric Acid, diked, empty	Southeast corner of Building 6
15,000	Hydrochloric Acid, diked, 2,000 gallons remaining	Southeast corner of Building 6
8,000	Ink product, mineral oil based, empty	Inside Building 30
8,000	Ink product, mineral oil based, empty	Inside Building 30
8,000	Ink product, mineral oil based, empty	Inside Building 30
8,000	Ink product, mineral oil based, empty	Inside Building 30
20,000	Varnish. This tank was separated into four equal vessels for varnish storage, empty	Inside Building 27
1,200	Sulfuric Acid, diked, empty	East of Building 8
23,500	There were ten tanks for varnish storage, empty	Adjacent to the east wall of Building 4
5,000	Empty, diked, unused by BASF, used for acid storage during UTC ownership	Southeast corner of Building 6

No. 6 fuel oil was stored in two 20,000 gallon above ground fuel oil tanks. These tanks were set on a concrete pad. There were two concrete walls for containment. Containment was achieved around the remaining perimeter of the storage tank area by an earth berm

##### NON-HAZARDOUS SUBSTANCE STORAGE

SIZE	DESCRIPTION	LOCATION
6,500	New tank, unused, empty and diked	Southeast corner of Building 6
6,500	New tank, unused, empty and diked	Southeast corner of Building 6
6,000	Latex, empty	Roof of Building 4
6,000	Latex, empty	Roof of Building 4

The following is the identification of the underground storage tanks and their status as of 1985:

#### Underground Storage Tank Usage

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No.	Yr. Built	Capacity	Original use	1970	1975	1985
1	1950	5,000	Reclaimed alcohol	Reclaimed Alcohol	Sludge	Removed
2	1950	5,000	Alcohol	Reclaimed alcohol	Sludge	Removed
3	1950	5,000	Isopropanol	Isopropanol	Isopropanol	Removed
4	1950	5,000	Ammonia	Ammonia	Empty	Removed
5	1950	5,000	Methanol	Methanol	Methanol	Removed
6	1964	6,000	Filtrate	Vat Yellow Filtrate Vat Yellow pigment is associated with 1-Amino anthraquinone, phthalyl chloride, nitrobenzene, and methanol	Empty	Removed
7	1964	5,000	Nitrobenzene	Nitrobenzene	Empty	Removed
8	1964	5,000	Methylene Chloride	Methylene Chloride	Empty	Removed
9	1964	15,000	Monomer	Methanol	Empty	Removed
10	1964	5,000	Recovered Methanol	Recovered Methanol	Empty	Removed
11	1964	5,000	Trichloro-Benzene	Trichloro-Benzene	Empty	Removed
12	1964	5,000	Toluene	Toluene	Empty	Removed
13	1964	5,000	Spare	Orthodichloro benzene	Empty	Removed
14	1964	5,000	Dichloro-benzene	Nitrobenzene	Empty	Removed
15	1964	5,000	Isopropanol Amine	Nitrobenzene	Empty	Removed
16	1964	5,000	Spare	ODCB Filtrate	Empty	Removed
17	1969	10,000	Empty	Caustic	Caustic	Removed
18	1969	5,000	Nitro Rich Vat Yellow	Empty	Empty	Removed
19	1969	5,000	Alcohol Rich Vat Yellow	Empty	Empty	Removed
20	1969	5,000	Cellosolve	Empty	Empty	Removed
21	1969	10,000	Nitro Rich Vat Yellow	Empty	Empty	Removed
22	1969	10,000	Alcohol Rich Vat Yellow	Empty	Empty	Removed
23	1969	5,000	Empty	Empty	Ammonia	Removed
29	1950	15,000	Turpentine	Solvenol 226	Solvenol 226	Empty
30	1950	15,000	Solvesso 100	Solvesso 100	Solvesso 100	Empty
31	1950	13,500	Melamine	Resimene K896 (Petroleum hydrocarbon)	Resimene K896 (Petroleum hydrocarbon)	Empty
32	1950	13,500	Pine Oil	Pine Oil	Pine Oil	Empty
33	1950	10,000	Octyl Alcohol	Octyl Alcohol	Octyl Alcohol	Magie 470 Oil (Petroleum hydrocarbon)
34	1950	10,000	Solvesso 100	Solvesso 100	Mineral Oil	Empty
35	1957	7,500	Mineral Oil	470 Oil	Magrisol 52	Magie 500 Oil
36	1957	2,500	Ink Oil	Aquasol GS	Magrisol 52	Magie 500 Oil (Ink Oil - petroleum distillate)
37	1957	5,000	Xylene	Xylene	Xylene	Xylene
38	1957	5,000	Varsol	Varsol #2	Varsol #2	Empty
39	1957	10,000	Spare	Solvenol 226	Empty	Empty
44	1969	5,000		440 Oil	Hydrosol 47	Magie 470 Oil
45	1969	5,000		Vaporin Sollinn 0431	Gulf 896 Oil	Empty
46	1969	10,000		Empty	Empty	Empty
47		6,000				Waste Xylene
48		1,000			Heat Transfer Oil	Empty

Underground Tanks Nos. 1 through 23 consisted of 13 tanks made up of 23

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compartments (Tank Farm No. 1). These tanks were removed by Canonie Engineers in March 1985 for UTC/Inmont. Tank Farm No. 2 consisted of tanks 29 through 39 and 44 through 37.

Building No. 25 was used as a pilot plant during UTC ownership. During BASF's operations finished products and raw materials were stored in and adjacent to this building. At no time was Building No. 25 used by BASF for purposes other than storage.

Raw materials were stored in Warehouse Building No. 3. and five underground tanks in Tank Farm No. 2. The materials in the warehouse were stored on steel shelves and pallets in bags, pails and 55-gallon drums.

The following is an inventory list of the hazardous substances prepared by UTC/Inmont in conjunction with its ECRA filings. These were stored in 55-gallon drums, bags or pails on pallet racks.

SUBSTANCE	HAZARDOUS COMPONENT	QUANTITY (LBS) **
Anhydrous sodium bisulfite	Sodium bisulfite	3,000
Aluminum Sulfate Iron Free	Aluminum Sulfate	131,800
Hydrochloric Acid	Hydrochloric Acid	1,989,550
Sulfuric Acid	Sulfuric Acid	600
Acetic Acid	Acetic Acid	750,300
Aqua Ammonia	Ammonia	94,000
Sodium Hydroxide	Sodium Hydroxide	1,170,000
Aniline Oil	Aniline	5,400
Dichlorobenzidine	Dichlorobenzidine	761,840
Sodium Nitrite	Sodium Nitrite	680,000
Citric Acid	Citric Acid	15,000
Mananese Octoate	Petroleum Hydrocarbon	151
Rare Earth 6% Ten Chem Printing Ink Drier	Petroleum Hydrocarbon	179
Spurso	Petroleum Hydrocarbon	5,200
6% Rare Earth Neodecanate	Petroleum Hydrocarbon	188
Schercoquat DAB	Methanol	6,620
Mineral Oil G.S Phthalo Blue	Petroleum Hydrocarbon	4,480
H.S. 470 Phthalo Blue	Petroleum Hydrocarbon	82,950
Oil #996	Petroleum Hydrocarbon	5,252
C.P. Primrose Yellows	Lead, Chromium	11,600
Chrome Yellow Medium	Lead, Chromium	23,700
Molybdate Red Orange	Lead, Chromium	23,900
Primrose Yellow	Lead, Chromium	4,000
Ming Orange	Lead, Chromium	3,000
Grinding Vehicles 100s	Petroleum Hydrocarbon	48,000
Arofene 8318 Flakes	Formaldehyde	48,000
Magie 500 Oil	Petroleum Hydrocarbon	4,506
Magie 470 Oil	Petroleum hydrocarbon	47,036
Gulf Oil #896	Petroleum Hydrocarbon	10,161
Magiesol 47	Petroleum Hydrocarbon	58,024
Xylol	Xylene	17,992
Aromatic 400	Petroleum Hydrocarbon	768
Tetron 60	Petroleum Hydrocarbon	350

\*\* The amounts indicated were those purchased during 1984. Approximately 10% of the

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amounts indicated were reported to be on hand at any one time.

Drum storage at the Facility was located in four areas: within Building No. 30, an outdoor drum storage area between the Pilot Plant and former Building No. 5, adjacent to Building No. 31, and Building No. 3.

The flush base products at the Hawthorne facility were considered hazardous because they were dispersed in varnish containing petroleum hydrocarbons. The Facility produced approximately 3.5 million pounds a year. The flush base products were packaged into 55-gallon drums and stored on pallets in 55-gallon drums and were stored in the Warehouse Building No. 30. They were:

Multiking Transparent AAA Diarylide Yellow  
470 speed HSHG AAA Transparent Diarylide Yellow  
500 speed HSHG AAA Transparent Diarylide Yellow  
470 speed HSHG AAA Diarylide Yellow  
Fossil set AAA Diarylide Yellow  
LTD Yellow  
Multiking AAOA Diarylide Yellow  
Miltiking AAA Transparent Yellow  
470 Speed HSHG G/S Phthalo Blue  
Mineral Oil G.S Phthalo Blue  
LTD G/S Phthalo Blue  
Multiking G/S Phthalo Blue  
500 Speed HSHG Lithol Rubine  
500 Speed HSHG Red Lake C  
470 Speed HSHG Lithol Rubine  
Mineral Oil Lithol Rubine  
Fossil Lithol rubine  
Multiking Lithol Rubine  
LTD Lithol Rubine  
Multiking Red Lake C  
Barium Oithol Gravure Flush (also contains xylene)  
Mineral Oil Red Lake C  
Fossil Set G/S Phthalo Blue  
Mineral Oil Diarylide Yellow  
Sprint Diarylide Yellow  
Sprint Lithol rubine  
Sprint G/S Phthalo Blue



Diarylide Yellow Gravure Flush (also contains xylene)  
Techmont Yellow 184-V-10  
Techmont Yellow  
Techmont Transparent Yellow  
R.R. Donnelly Phthalo Blue  
R.R. Donnelley Lithol Rubine  
R.R. Donnelley Red Lake C  
R.R. Donnelley Yellow

Inmont reported that the only hazardous waste generated at the Hawthorne facility were waste xylene solvent with pigment sludge. This waste material was stored in a 6,000-gallon carbon steel underground tank (Tank No. 47) in Tank Farm No. 2.

Hazardous waste was also stored on Building No. 5 ramp. The Building No. 5 ramp was a concrete pad where drums were stored prior to disposal.

A summary of Inmont/UTC's drum storage areas as of 1985 (with reference to the attached map "BASF Inmont-Hawthorne Plot Plan Drum Storage Areas") is set forth below:

Drum Area No.	Area	Estimated Capacity (Drums)	Material Description	Average Number of Drums Stored
1	Building 30	500	DCB Receiving Area	300
2	Building 30	7,000	Finished Good Storage	5,600
3	Building 3	4,200	In-process Pigment Presscakes	4,000
4	Building 3	300	DCB Immediate Process Need	150
5	Building 3	3,000	Raw Materials	2,400
6	46 Trailer	150	Empty Drum Storage Trailer	100
7	46 Yard	500	In-Process Pigment Presscakes	400
8	Pilot Lab	200	Liquid Raw Materials	50
9	Building 5 Platform	1,000	Empty Used Containers, Waste	200
10	Building 5 Roadside	300	Raw Material - Varnish	100
11	Roadside	300	Empty new drums	150
12	Boiler Room	16	Water Treatment Chemicals	8

i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

Drum storage was located in three areas. One area was within Building No. 30, another was the outdoor drum storage area between the pilot lab and former Building No. 5,

**and a third was adjacent to building No. 3.**

**The outdoor drum storage area between the pilot lab and former Building No. 5 was concrete. It was used by BASF to store 55-gallon drums containing non-reactive dust collector dust contaminated with lead chromate pigment. This solid material was hazardous due to the elevated EP toxicity levels of lead and chrome. No more than 60 drums were allowed to accumulate by BASF prior to disposal.**

ii) When drums were stored outside, were empty drums segregated from full drums?

d) What processes do you use to treat your waste? What do you do with the waste after it is treated?

**See infra.**

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and/or is related to this Request, as required by the Instructions.**

6) a) For process waste waters generated at the Facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):

i) Where was the waste water discharged and during what years?

**During the early years of the Facility's operation the Passaic River served as the primary source of process and cooling water. As the quality of water declined, it was necessary to switch to Hawthorne town well water for all processing water requirements. At least until 1985 the river water was used for cooling and cleaning purposes.**

**Process and cleaning waste water was discharged to the Passaic Valley Industrial Sewer System; non-contact cooling water was returned to the Passaic River. The discharge point was regulated by a NJPDES permit. During some historical period before 1972 the non-contact cooling water was discharged to the Passaic Valley Industrial Sewer.**

**There was an outdoor waste water sump servicing Building No. 25 which was not used during BASF's operations.**

**As of late 1985 the facility discharged 450,000 gallons per day of untreated process water to a 300 million gallon per day treatment plant operated by the Passaic Valley Sewerage Commission. This effluent had a high level of suspended solids and biodegradable matter. The Facility monitored its sewerage daily and reported these results to the Passaic Valley Sewerage Commission. As of late 1985 values were running 200-600 mg/l TSS and 600-1,000 mg/l day BOD. The effluent was alkaline with a pH of 7-8.5. As of late 1985 the Facility encountered no problems with the sewerage authority.**

- ii) Was the waste water discharged into a sanitary sewer and if so, during what years?

**See response to subsection i), above.**

- iii) Was the waste water treated before being discharged to the sanitary sewer and if so, how? Please be specific.

**The process water was not treated prior to discharge to the Passaic Valley Sewerage Commission.**

- iv) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?

**See response to subsection i), above.**

- v) Please provide the results of any analyses performed on any waste process streams generated at the facility.

**Until 1981 monitoring of sewer discharge for solids, Biological Oxygen Demand (BOD) or Chemical Oxygen Demand (COD) was not required. There after it was sampled and analyzed daily for pH, solids and BOD requirements.**

**The effluent was monitored for acidity.**

**An effluent sample of process waste water was analyzed in 1985. Detected was toluene and ethylbenzene at concentrations of 24 and 30 ppb. Copper, associated with the processing of phthalo blue pigments was detected at a concentration of 30 ppb. It was reported that no dichlorobenzidine was detected at any time.**

- b) For floor drains or other disposal drains at the facility:

- i) Did the drains connect to a sanitary sewer and if so, during what years?

**There were manufacturing and storage operations carried out in the following buildings with each production area having a floor drain system that discharged to the sanitary sewer: 4,6, 6A, 7, 9A, 25, 30, 31.**

**Pigment synthesis and filtrations were performed in Building 6. Water-based pigment dispersion were prepared in this area as well. Within Building 6 were two separate sunken production areas where pigments were manufactured. At the bottom of each of these sunken areas were sump pits that were fed by an underlying collection system. Spills, leaks and washdown from all areas of the building were directed to these sumps and pumped up to floor level by sump pumps. After being pumped out of the sumps, this discharge was directed to the process sewers.**

- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?

**See response to subsection b) i), above. Roof drains discharged to the storm sewer system, as described in response to subsection c), below.**

- c) i) Did any storm sewers catch basins or lagoons exist at any time at the facility and if so, during what years?

**Storm sewer catch basins existed at the Facility. The storm sewer system connected to a drainage ditch. BASF has discovered no information to suggest that lagoons ever existed at the Site.**

- ii) If catch basins or lagoons existed, were they lined or un-lined?

**The drainage ditch was unlined.**

- iii) What was stored in the lagoons?

**See response to subsection c) i), above.**

- iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released?

**In addition to the non-contact cooling water, stormwater, roof drains and boiler blow**

were discharged to the outfall at the Passaic River. As of 1985 the boiler blow was to be rerouted to the sanitary sewer.

The stormwater runoff picked up oil and pigment dust from the Facilities' roadways and outdoor storage areas. Three absorbent filled cages along the outfall were installed to capture these contaminants.

A November 1985 an EPA Performance Audit Inspection was conducted at the Facility to determine the quality and reliability of self-monitoring data being submitted by Inmont in fulfillment of the requirements of NJPDES Permit No. NJ 000 2453. A number of deficiencies were noted. (See infra)

The facility was closed in 1986 by BASF. All operations connected with the discharge of non-contact cooling water were discontinued on September 19, 1986. All surface discharges except for stormwater ceased at this time.

In May of 1987 testing of the storm water identified the following chemicals at concentrations above the detection limit: 1,2,4 Trichlorobenzene; 1,2-Di Chlorobenzene, 1,3-DiChlorobenzene, 1,4-Di Chlorobenzene, Nitrobenzene, Fluoranthene. It is believed that these chemicals were leaching into the stormwater drainage system from surrounding soils. A second analysis of the stormwater carried out in October 1989, found only Di N Butylphthalate in concentrations above the detection limit.

d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.

See attached Map. (See attached Map prepared by Lan Associates, Inc. in conjunction with Inmont/UTC's ECRA obligations, designated as M-3, "Sanitary and Storm Sewer Location Plan".)

See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount

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generated during the operation of the facility on an annual basis.

The available documentation indicates that the total quantity of hazardous waste manifested from the Facility by year ( as reported in the NJDEP TSDF Annual Report) is as follows:

YEAR	GALLONS	POUNDS
1981	30,000 (estimate)	
1982 (records – but no compilation)		
1983	(see below)	(see below)
1984	18,592	
1985	34,992	10,917
1986	22,284	2,480
1987	330	8,120
1988	64,495	19,620
1989	67,460	173,529

#### 1983 Calendar Year

WASTE TYPE	GALLONS	POUNDS
Solvent Waste	16,348	
Petroleum	975	
Transformers w/PCB (Oil)	282	
Solid Hazardous Waste NOS		980
Picric Acid		1
Flammable Solid NOS		3
Flammable Liquid NOS		4
Waste Poison – B Solid		103
Flammable Corrosive Liquid		267
Oxidizer Poison NOS		69
Corrosive Liquid NOS		249
Corrosive Solid NOS		60
Poison – B Liquid NOS		97
Waste Chemical No. 1 (non regulated)		16

The available NJDEP Generator Annual Reports for 1983, 1984, 1985, 1986 and 1987 provide the following information:

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Year	Waste Description	Waste Type	Quantity/Units
1983	Solvent Waste	U239	2800 gallons
1983	Solvent Waste	U239	3059 gallons
1983	Solvent Waste	U239	2200 gallons
1983	Solvent Waste	U239	2839 gallons
1983	Solvent Waste	U239	2000 gallons
1983	Solvent Waste	U239	3450 gallons
1983	Oil, petroleum	D001	975 gallons
1983	Solid Hazardous Waste, NOS	X910	980 pounds
1983	(3) transformers with PCB oil		282 pounds
1983	Flammable Liquid NOS	D001	2 (unknown)
1983	Waste poison -B- Solid NOS	X940	2 (unknown)
1983	Flammable Liquid Corrosive	D001	267 (unknown)
1983	Oxidizer Poison NOS	D001	69 (unknown)
1983	Corrosive Liquid NOS	D002	249 (unknown)
1983	Corrosive Solid NOS	D002	60 (unknown)
1983	Poison - B Liquid NOS	NJ X940	97 (unknown)
1983	Poison - B Solid NOS	NJ X940	101 (unknown)
1983	Waste Chemical No. 1	NJ X940	16 (unknown)
1983	Picric Acid	D003	1 (unknown)
1983	Flammable Solid NOS	D003	1 (unknown)
1983	Flammable Solid	D003	2 (unknown)
1983	Flammable Liquid NOS	D003	2 (unknown)
1984	Solvent Waste m/Pigment sludge	U239	8259 gallons
1984	Solvent Waste M/Pigment Sludge	U239	10,333 gallons
1985	Waste Solvent (Xylol)	U239	9,976 Gallons
1985	Nitrobenzene	F004	4,250 Gallons
1985	Nitrobenzene	F004	2,4600 Pounds
1985	Nitrobenzene	U169	3,168 Gallons
1985	Waste Solvent (Xylol)	U239	3,238 Gallons
1985	PCB ORM-E	X387	1,0917 Pounds
1985	Liquid Varnish	X900	4,200 Gallons
1986	Combustible Liquid	D001	1,000 Pounds
1986	Flammable Liquid	D001	150 Pounds
1986	Waste -Poisonous	D005	450 Pounds
1986	Corrosive Solid Waste	D002	130 Pounds
1986	Hazardous Substances Solid	D001	590 Pounds
1986	Oxidizer Waste	D001	30 Pounds
1986	Flammable Liquid Waste	D001	1,870 Gallons
1986	Combustible Liquid Waste	D001	715 Gallons
1986	Waste Oil	X726	110 Gallons
1986	Flammable Liquid Waste	D001	7,000 Gallons
1986	Spent Sulfuric Acid	D002	1,200 Gallons
1986	Acid Waste	D002	1,200 Gallons
1986	Corrosive Liquid Waste	D002	1,283 Gallons

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1986	Flammable Liquid Waste	D001	1,485 Gallons
1986	Flammable Liquid Waste	D001	5,200 Gallons
1986	Flammable Liquid Waste	D001	3,421 Gallons
1987	Solidified Amines	X910	6,200 Pounds
1987	Waste Aniline Oil	U012	800 Pounds
1987	Waste Styrene Monomer	D001	200 Pounds
1987	Packaged lab Chemicals	D003	20 Pounds
1987	Waste Liquid Imidazolines	D002	110 gallons
1987	BAC Aliphatic Diamine	D002	900 Pounds

**Miscellaneous records provide the following additional information:**

DATE	VOLUME	WASTE
March 1980	3,000 gallons	Waste Xylene solvent
February 1980	3,000 gallons	Waste solvent
July 1890	3,000 gallons	Waste Xylene Solvent

b) Were any hazardous substances, including but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river, which you might have done after any discharge or disposal.

River water, used for non-process contact cooling, was returned to the River under the guidelines established by the National Pollutant Discharge Elimination system (NJPDDES). Analysis for pH, temperature, color, COD, suspended solids, oil and grease, petroleum hydrocarbons and volume were reported on a bi-annual bases to the NJDEP.

See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). Were released on the property, into the waste water or storm drainage system at the Facility or to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

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AREA	DATE	INCIDENT
Building No. 5	1967-1975	Building No. 5 was building in 1967 and demolished in 1975. It housed solvent based reactions. There were many dyestuff processes carried on both inside and outside the Building. Sulfuric acid was used in the processes and it has been reported that a number of sulfuric acid drums which were found to be leaking were buried on the side in the area behind Building No. 5. The exact date of the burial or exact quantity has not been determined.
	1967-1975	The "drowning" (ice and water quenching) of quinizarin was conducted outside of building No. 5. Product may have reached the ground. By-products of the reaction were sulfuric acid and phthalic acid. The exact quantities of materials spilled cannot be determined.
Building No. 4	1973	A tank used to store dirty wash solvent behind Building No. 4 overflowed in early 1973. It was recommended that an alarm be installed to prevent future occurrences.
Building No. 9A	August 1978	Paint. It was reported that a discharge of paint occurred to the drainage trench. The exact quantity of material is not known. A boom was set up and the paint was removed from the trench by skimming. The final cleanup was inspected by the EPA and reported to be satisfactory.
	March 1979	Red Colorant. It was reported that 5 gallons of red colorant identified as 9% Red Lake C (91% mineral oil) spilled in Building No. 9A as a result of a blown filter. The floor was cleaned with an industrial grade of mixed xylenes. The solvent rinse was dumped into an industrial sewer drain. However the drain was clogged and apparently overflowed into a broken ceramic cooling water drain which discharged into the brook return. The red pigment was found on the banks of the drainage trench and cleaned by maintenance personnel.
Fuel Oil Tanks	1977, 1978, 1979, 1982	There were five reported incidents involving spillage of No. 6 fuel oil. There were two aboveground fuel oil tanks, each having a capacity of 60,000 gallons. The tanks were contained within two concrete walls and the remaining perimeter by an earth berm.
	March 1977	Approximately 400 gallons of fuel oil was spilled and reached the drainage trench. Two safety valves were open on the fuel oil tank and it over-flowed during filling. A boom was placed at the end of the trench and the fuel oil was purported not to have reached the Passaic River.
	May 1978	A 200 gallon spill was contained within the dike area. A second spill of an unknown quantity was recorded. A boom was placed at the end of the trench and the spilled oils recovered before reaching the Passaic River
	March 1979	A spill was reported when a tank overflowed. The spill was contained in the diked area and cleaned.
	March 1982	3,000 gallons of fuel oil were spilled in the containment area. At that time 12 to 15 drums of an oil and water mixture overflowed near the old maintenance shop during a rainstorm.
Sulfuric Acid	April 1986	During BASF operation an overfill of the sulfuric acid tank occurred. Approximately 150 to 200 gallons of a 30% sulfuric acid solution flowed to a nearby drain. The spill area was washed down and the NJDEP was

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		notified.
Tank Farm II	April 30, 1986 to May 3, 1986	During this period BASF excavated 16 underground product storage tanks. During the process of removing the tanks the connecting pipes spilled solvents, liquids and oils onto the underlying soils. The exact quantity of material spilled is not known.
Building No. 24 Building No. 6	September 1988	A subcontractor of BASF's demolition contractor, OH Materials, failed to equalize the pressure in a vacuum trunk tank before attempting to empty the load from of contaminated aqueous liquid (dichlorobenzidine) . It was sucked from a below level pit in building No. 6 and was to be pumped into a provisional collection basin installed on a concrete pad (of former Building No. 24.) Due to operator error approximately 200 gallons of the contents were spread over 1300 square feet. The spill was remediated.
Used Motor Oil	November 1991	Samuel Faletti of Irvington, NJ was employed as a security guard through DB Kelly Associates for BASF. During his shift he poured an estimated six quarts of used motor oil into a catch basin of the storm sewer. This was immediately cleaned up.
Flourescein	May 1995	An isolated area of green staining was discovered at the rear of Building #3. It reportedly came out of the ground perhaps during demolition activities. Shortly thereafter it was observed traveling toward the storm sewer. Necessary corrective action was immediately taken. It was suggested that the green staining was a green dye, fluorescein, that was manufactured at the Facility before the Inmont Transaction.
Miscellaneous	Before 1986	Nitrobenzene, aniline and other base neutral compounds were found in the groundwater below the Site. It is believed that nitrobenzene has leaked from the tank farm which has been removed from the Site.
Miscellaneous	Before 1950	It is believed by Inmont that the southerly boundary of the Site could have been used for waste disposal by the Weidman Dye Works, previous owners of the Site.
Miscellaneous	Between 1967 and 1975	Building #5 housed many solvent reactions which were once performed. A reaction involving Quinizarin was performed out of doors in a vessel adjacent to the building and was reported to have overflowed on a number of occasions.

a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

See attached **SOURCE OF INFORMATION** for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

9) a) Was your facility ever subject to flooding. If so, was the flooding due to:

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**The only information responsive to this Request is identified in the SOURCE OF INFORMATION.**

- i) overflow from sanitary or storm sewer back-up, and; or
  - ii) flood overflow from the Passaic River?
- b) Please provide the date and duration of each flood event.

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

10) Please provide a detailed description of any civil criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

**A NJDEP Administrative Consent Order between the NJDEP and Inmont pursuant to the Environmental Cleanup Responsibility Act, NJSA 13:1k-6 et. seq. captioned "In the Matter of United Technologies Corporation" was entered to allow the sale of Inmont Corporation to BASF prior to United Technologies Corporation completion of all administrative requirement under ECRA.**

**Inmont received the following NJDEP Notices of Violation:**

DATE	VIOLATION OF	DESCRIPTION
April 29, 1974	NJAC 7:27-8.3 (a) and (b)	Five mixing tanks and a scrubber were constructed without first having obtained a construction permit.
September 26, 1974	NJAC 7:27-8.3 (a) and (b)	Kettle K-15 was disconnected from a packed scrubber without having obtained a permit to alter control equipment.
March 23, 1977	OSHA violation of 29 CFR 1910.1007(d)(4)(iii)	Decontamination procedures are not adequate to remove 3,3 dichlorobenzidine (or its salts) from the surfaces of the reactor vessels in the regulated area
March 23, 1977	OHSA violation of 29 CFR 1910.1007(e)(5)(i)(d)	Employees in regulated 3,3 dichlorobenzidine area were not properly trained and indoctrinated

		with the purpose for and application of decontamination practices
May 6, 1977	OSHA violation of 29 CFR 1910.1007(c)(4)(v).	The impervious containers, placed at the point of exit from the regulated area and used for the purpose of decontamination and/or disposal of protective clothing, were not labeled so as to identify their contents as required un this section
October 16, 1980	NJAC 7:27-8.3(a)	Notice of Prosecution. The DCB Scrubber was constructed without obtaining a NJDEP Permit to construct on air pollution source.
October 18, 1983		Failure to submit Hazardous Waste Annual Report
July 10, 1984		Failure to submit Hazardous Waste Annual Report
October 18, 1983	NJSA 13:1E-1 NJAC 7:26-7.6(f) 2	A TSD Facility Annual Report for 1982 was not submitted to the NJDEP Division of Waste Management by March 1, 1983
July 10, 1984	NJSA 13:1E-1 NJAC 7:26-7.6(f) 2	A TSD Facility Annual Report for 1983 was not submitted to the NJDEP Division of Waste Management by March 1, 1984

In conjunction with a February 1, 1979 NJDEP National Pollutant Discharge Elimination System (NPDES) Compliance Evaluation Inspection, Inmont was notified of the following deficiencies.

1. The analysis of the 001 discharge showed excessive concentration for COD and Oil and Grease. It was observed during sampling that significant traces of oil was present at the discharge point.
2. Two storm drains are possible sources of chemical contamination – one, near the pilot plant building; second, located at the garbage unloading dock. It was noticed during the plant tour that the storm drain at garbage unloading dock has significant traces of chemical run-off.
3. It was found that 24-hour composite samples are not being taken because of a malfunction in sampling devise. It was acknowledged that this sampler had been broken for several months.

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4. A review of past discharge monitoring reports revealed that on several occasions, COD and Color limits have been violated.

In conjunction with an EPA Performance Audit Inspection performed on November 6, 1985, Inmont received the following deficiency notices:

1. Sample is not representative
2. Container used to collect the oil and grease sample should have a Teflon lined cap
3. The holding time for petroleum hydrocarbons is occasionally not met
4. Samples are not maintained at the correct temperature; samples are not preserved
5. In-house lab is not certified; thermometers are not calibrated; the standards used in the color analysis are not replaced often enough
6. Records are not maintained on the time the samples were taken; records are not maintained properly on pH calibrations
7. pH measurements should be done within 15 minutes on-site, not at an outside lab.

In conjunction with a NJDEP unannounced inspection in July 1985, Inmont received a Notice of Violations as follows:

DATE	VIOLATION OF	DESCRIPTION
July 31, 1985	NJAC 7:26-7.4(o) 5.ii	a copy of No. NJ 0066632 (7/19/83) missing signature and date of acceptance of the initial transporter
	NJAC 7:26-9.4(b) 2ii	no description of test methods in waste analysis plan
	NJAC 7:26-9.4(b) 2iii	no description of sampling method in the waste analysis plan.
July 31, 1985	NJAC 7:26-9.7 (f)	Emergency coordinators list does not include the home addresses and office phone numbers
	NJAC 7:26-9.7 (g)	No emergency equipment list included in the contingency plan

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**BASF received the following evaluations following NJDEP – Division of Water Resources - Compliance Evaluation Inspection:**

DATE OF NOTICE	DATE OF INSPECTION	RATING	DEFICIENCY DATE	DEFICIENCY
August 23, 1989	June 14, 1989	Unacceptable	January/February 1989	The permit limit for Total Suspended Solids was exceeded.
			February 1989	The permit limits for petroleum hydrocarbons was exceeded.
June 1, 1990	May 10, 1990	Unacceptable	April/June/July/August 1989	Color
			July/August 1989	PH
			September/November 1989	Color
			January 1980	Color
December 2, 1992	December 2, 1992	Conditionally Acceptable	July/1992	Color and COD violations
			September/1992	TSS violation
				Sampling and temperature issues

**BASF received the following Notices of Violations from the NJDEP – Division of Water Resources for violations of the New Jersey Water Pollution Control Act and its regulations:**

DATE OF NOTICE	TIME FRAME	VIOLATION
November 30, 1990	April/May/June 1990	The facility exceeded the effluent limitation for color
May 5, 1992	November 1991 through February 1992	Failure to sample twice per month
May 22, 1992	March 1992	Color, COD, and TSS
December 2, 1992 <sup>1</sup>	June/1992	Color and COD violations
	July 1992	Color and COD violations
	September 1992	TSS violation
March 13, 1993	December /1992	Color violation
June 2, 1993	March 1993	TSS violation
December 17, 1993 <sup>2</sup>	August 1993	Serious violation for Total Suspended Solids
	May/June 1993	COD violations
	May/June/July 1993	Color violations
	September/October 1993	Color violations
December 10, 1993	August/1993	Total Suspended Solids

<sup>1</sup> None of the COD or TSS violations were “serious” violations as defined by the ACT.

<sup>2</sup> Runoff/discharge results are from UTC’s Site Cleanup under ECRA.

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**In September 1986 the NJDEP – Division of Water Resources issued a Directive to the Inmont Division of BASF Corporation stating that severe contamination of the groundwater at the Inmont Site was identified during an ongoing hydrogeologic investigation of the contaminated municipal wells (North Wagaraw Well Field).**

**In December 1982 Inmont received an EPA Complaint, Compliance Order, And Notice of Opportunity for Hearing pursuant to Section 3008 of the Solid Waste Disposal Act arising out of an inspection of the Facility on July 16, 1982. It was alleged that Inmont failed to submit an exception report to the appropriate EPA Regional Administrator when the generator had not received a copy of the manifest with the handwritten signature of the owner of the designated TSD facility within 45 days of the date the wastes was accepted for transport. Inmont admitted that it shipped manifested hazardous wastes on September 8, 1981, February 18, 1982 and April 13, 1982, and that it did not receive signed copies of the manifests from the TSD operator within 35 days, but through inadvertence, failed to file Exception Reports with the Regional Administrator within 45 days.**

**On or about April 2, 1985 Inmont received a EPA Complaint, Proposed Civil Penalty, Compliance Order, Notice of Liability for Additional Civil Penalties and Notice of Opportunity to Request a Hearing for Violation of NJAC 7:26-9.8 and 7:26-9.10. It was alleged that on or about February 6, 1985 the EPA requested that Inmont submit a copy of the Closure Plan and Cost Estimate required under regulation. The submission was found to be deficient.**

**In April 1988 “BASF Corporation, BASF’s Coating and Inks Division, formerly known as Inmont Corporation” and others were sued in a purported class action instituted by the residents of the Borough of Hawthorne. It was alleged that the defendants contaminated the groundwater and municipal water supply.**

**In January 1996 the Borough of Hawthorne sued BASF and others alleging that groundwater contamination emanating from their facilities contaminating the South Field Meter Pumping Station.**

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice,

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inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

**See attached SOURCE OF INFORMATION for the identification of each document that is responsive to this request. Pursuant to 42 USC Section 9604(e)(2), BASF will, upon reasonable notice, grant access at all reasonable times, to a representative of the EPA, to inspect and copy all documents or records identified on the attached SOURCE OF INFORMATION or such further information as may be developed.**

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above.

**Yes. In conjunction with the ECRA/ISRA activities described herein, UTC/Inmont and BASF have conducted extensive sampling programs. In addition, as described herein, the NJDEP/USEPA required certain sampling events. For example:**

**In early 1982 the NJDEP conducted a groundwater investigation in Hawthorne to determine possible sources of contamination by chlorinated solvents in local supply wells. The Inmont Facility was believed to be a source and a series of directives were issued for Inmont to investigate the issue. Inmont retained Geraghty & Miller in March 1982, to perform an investigation of the possible presence of Site chemicals in the bedrock aquifer. Eight bedrock and eight overburden wells were installed at the Site. Based on the static groundwater elevations collected from these wells, it was concluded that groundwater flow, within the bedrock, was in the direction of the Hawthorne borough well field and also toward the Passaic River. From 1982 through the spring of 1983, several rounds of groundwater chemical analyses were performed. Test results identified chlorinated benzenes, 1,1,1-trichloroethane, trichloroethylene, tetrachlorethane, toluene, nitrobenzene, styrene, aniline and other compounds. Of these organic compounds, nitrobenzene, aniline and toluene occurred in the greatest concentrations. In December of 1982 Geraghty & Miller concluded that the groundwater at the Hawthorne Plant contained the organic chemicals PCE, 1,1,1 TCA, TCE, trichlorofluoromethane, nitrobenzene, and toluene but that since Inmont had no records of having used the organic chemicals found in the groundwater at the Site, and that the compounds were characteristic of the dye stuff industry, activities associated with the Weidman silk Dyeing company were most likely responsible for the introduction of the compounds into the groundwater system.**

**An analysis of ground-water conditions at the Site prepared for Inmont in August 1984 by Geraghty & Miller found that base neutral compounds, nitrobenzene and aniline appeared to be the principle chemicals impacting the quality the groundwater. Inmont reported that it was not the source of these substances, suggesting that the source was the Weidman Silk**

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**Dyeing Company. Several other base neutral compounds detected in groundwater at the Site were: 1,2,4-trichlorobenzene; dimethyl phthalate; and 1,2- 1,2- and 1,4-dichlorobenzene.**

**In was reported in 1985 that nitrobenzene, aniline and other chemicals associated with discontinued dyestuff production were detected in 200 to 300 feet deep wells. Nitrobenzene levels of approximately 100,000 ppb and aniline levels of 50,000 ppb were measured in the most severely impacted wells.**

**In response to the sale of the property by UTC to BASF in 1985, and in compliance with ECRA requirements, UTC retained Lan Associates, Inc. to conduct an environmental study of the Site. Lan prepared and submitted the GIS, SES and SAP for the Hawthorne ECRA site investigation in September 1985. Fred C. Hart Associates, Inc. was later retained by UTC to prepare a Clean Up Plan.**

**UTC is responsible for completion of these activities in accordance with the terms of its 1985 Administrative Consent Order with the NJDEP and applicable environmental regulations.**

**In 1988, in conjunction with its RCRA closure of the Facility, BASF undertook a sampling program that included the drum storage area between the pilot lab and the former Building No. 5. Elevated levels of petroleum hydrocarbons, cadmium, chromium, copper, lead, mercury, zinc and base neutral extractables were detected at this location. BASF has no documented evidence of spills having occurred at this location. Thus, the source of these materials can be concluded to be the result of pervious operations or activities at the storage pad.**

**Also in conjunction with its RCRA closure BASF installed ground water monitoring wells at the 3,000-gallon capacity RCRA underground storage tank (Tank). This was used by BASF for the storage of flammable material containing xylene, oil, and diarylide yellow and azo red pigments. BASF used this tank from July 1985 to February 1986. The tank was located in the immediate vicinity of the former Tank Farm #2. This tank farm consisted of numerous underground tanks, transfer lines, vents and other appurtenances. During its existence the tanks in Tank Farm #2 stored products such as xylene and ethylbenzene. Tank Farm #2 was excavated in 1986 with the tanks and obviously contaminated soil removed. Soil samples collected from beneath the Tank indicated elevated levels of volatile organics, petroleum hydrocarbons and base neutral extractables. BASF installed five groundwater monitoring wells in the vicinity of the Tank. Analytical data from ground water samples indicate elevated levels of volatile organics (xylene and ethylbenzene) and base neutral extractables (naphthalene).**

**In July 1988 soil sampling at the RCRA storage pad was performed by BASF. These**

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**samples showed residual concentrations of volatile organics (including toluene), petroleum hydrocarbons, metals and base neutral. Metals of concern were cadmium, chromium, copper, lead, mercury, nickel, and zinc.**

**In August 1988, BASF implemented an approved Closure Plan of August 7, 1987; the RCRA UST tank was removed; visually contaminated soil was removed; confirmation samples were obtained.**

**In ceasing operations at the Site, BASF triggered its own ECRA/ISRA obligations. BASF's obligations were limited to facility decommissioning. BASF completed full facility decommissioning and submitted a Decommissioning Demolition Report to the NJDEP in October 1989. The NJDEP issued a negative Declaration for BASF's ECRA obligation in May 1990.**

**See documents identified in the SOURCE OF INFORMATION for complete sampling events and results.**

b) If so, please provide all other documents pertaining to the results of these analyses.

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property, and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.

**See answer to Request No. 1.**

b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.

**N/A**

c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

**See answer to Request No. 1. Interchemical Corporation purchased the property on July 2, 1946 from Edward K. Betts and Arthur Gilmore, a partnership and Grace Betts and**

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Grace Gilmore. The current address of these previous owners is unknown. At the time of purchase in 1946 the property had a number of production wells where were part of the adjacent Weidman Silk Dyeing Company water supply system. These wells were reportedly installed on the Site from 1910 to 1912 and were eventually abandoned in the 1980s. Inmont's groundwater analysis at the Site has shown the presence of plasticizers and other phthalate esters. These substances were not commonly used in the Inmont processes, and the investigators concluded that the presence of these chemicals is thought to be associated with the turn-of-the-century manufacturing practices of the Weidman Company.

See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.

14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

- a) State the legal name of your company.

**BASF Corporation**

- b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.

**The following are the Directors of BASF Corporation as of December 2002:**

<b>DIRECTOR</b>	<b>BUSINESS ADDRESS</b>
<b>Klaus Peter Loebbe Chairman</b>	<b>3000 Continental Drive – North Mt. Olive, NJ 07828-1234</b>
<b>Hans-Ulrich Engle</b>	<b>3000 Continental Drive – North Mt. Olive, NJ 07828-1234</b>
<b>Carl A. Jennings</b>	<b>3000 Continental Drive – North Mt. Olive, NJ 07828-1234</b>
<b>Frank E. McKulka</b>	<b>3000 Continental Drive – North Mt. Olive, NJ 07828-1234</b>
<b>Eckhard Mueller</b>	<b>BASF Aktiengesellschaft 67056 Ludwigshafen, Germany</b>
<b>Eckart Suenner</b>	<b>BASF Aktiengesellschaft</b>

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	67056 Ludwigshafen, Germany
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The following are the Officers of BASF Corporation as of April 1, 2003:

OFFICE	NAME	BUSINESS ADDRESS
President & Chief Executive	Klaus Peter Loebbe	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Executive Vice President & Chief Financial Officer	Hans-Ulrich Engel	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Executive Vice President	Carl A. Jennings	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Executive Vice President	Harold L. McDonald	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Executive Vice President	Frank E. McKulka	26701 Telegraph Road Southfield, MI 48034
Executive Vice President	Hans-Walther Reiners	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Senior Vice President General counsel Secretary	Thomas Y. Allman	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Senior Vice President Planning and Controlling	Robert E. Malone	3000 Continental Drive – North Mt. Olive, NJ 07828-1234
Treasurer	Philip E. Kaplan	3000 Continental Drive – North Mt. Olive, NJ 07828-1234

- c) State the number of people employed by your company.

The total number of employees at the end of 2002 was 13,284. The geographic breakdown is as follows: with 10,752 employees in the United States; 838 employees in Canada; 1,538 in Mexico, and 156 in Puerto Rico.

- d) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.

BASF Corporation is a corporation incorporated in the State of Delaware. The agent for service of process is CT Corporation System with the mailing address of The Corporation Trust Company, 820 Bear Tavern Road, West Trenton, NJ 08628. Phone (609) 538-1818.

- e) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.

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**The Articles of Incorporation and Restated By-Laws of BASF Corporation are attached Articles of Incorporation, Amended and Restated Certificate of Incorporation, and By-Laws)**

f) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.

**BASF Canada Inc.  
345 Carlingview Drive  
Toronto, Ontario  
Canada M9W 6N9  
Phone: (416) 675-3611**

**BASF Canada Inc. was formed as a corporation under the laws of Canada (Federal Statute – the Canada Business Corporations Act) on January 1, 1992, by amalgamation of BASF Canada Inc. & BASF Coatings & Inks Canada Inc. The name under which the subsidiary has conducted business: BASF Canada.**

**Polioles, S.A. de C.V.  
Fernando Montes de Oca No. 71  
Col. Condesa  
México, D.F. C.P. 06140  
Phone: (011.5255)91.40.05.00**

**The date of Organization: September 13, 1962. The state where the subsidiary was formed: Mexico, City. All the names under which the subsidiary has done business: Polioles, S.A de C.V.**

**BASF Coatings de México, S.A. de C.V.  
Avenida Uno No. 9  
Col. Parque Industrial Cartagena  
Tultitlán, Estado de México, C.P. 54900  
Phone: (0115255)58.99.38.31**

**The date of Organization: November 17, 1993. The state where the subsidiary was formed: Mexico, City. All the names under which the subsidiary has done business: BASF Pinturas, S.A. de C.V. and now BASF Coatings de México, S.A. de C.V.**

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**BASF Interservicios, S.A. de C.V.**

**Insurgentes Sur No. 975**

**Col. Ciudad de los Deportes**

**México, D.F. C.P. 03710**

**Phone: (0115255).325.26.00**

**The date of Organization: April 1, 2002. The state where the subsidiary was formed: Mexico, City. All the names under which the subsidiary has done business: BASF Interservicios, S.A. de C.V.**

g) Identify any predecessor organization and the dates that such company became part of your company.

**BASF Corporation is the corporate successor to BASF Wyandotte Corporation and Inmont Corporation. In 1968, BASF Corporation, a New York corporation, was formed. On December 31, 1970, BASF Corporation merged into Wyandotte Chemical Corporation, a Michigan Corporation, whose name was simultaneously changed to BASF Wyandotte Corporation, a Michigan Corporation. On December 12, 1973, BASF Wyandotte Corporation was purchased by Luchem Corporation, a Delaware Corporation. Luchem Corporation's name was changed to BASF America Corporation (Del.) on June 19, 1978.**

**The former Inmont Corporation, a Ohio Corporation, was created on April 15, 1969 as a result of Interchemical Corporation's name change. MEW Corporation, a wholly owned subsidiary of Carrier Corporation, was incorporated in Delaware on August 11, 1977 to act as a vehicle into which Inmont Corporation (Ohio) would be merged. On December 27, 1977, Inmont Corporation merged into MEW Corporation whose name was simultaneously changed to Inmont Corporation, a Delaware Corporation. Carrier Corporation, through a merger on July 6, 1979, became a wholly-owned subsidiary of United Technologies Corporation. On June 30, 1981, Carrier Corporation transferred all issued and outstanding shares of Inmont Corporation (Del.) to United Technologies Corporation.**

**On or about May 21, 1985, BASF America Corporation acquired Inmont Corporation from United Technologies Corporation. Thereafter, on December 31, 1985, BASF Wyandotte Corporation was merged into Inmont Corporation, which simultaneously changed its name to BASF Corporation, the current corporate entity.**

**See Response to Request No. 1.**

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- g) Identify any other companies which were acquired by your company or merged with your company.

**BASF objects to this Request in that it is overbroad and burdensome. See infra.**

- i) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey and nature of business activity for each company identified in the responses to items (14)(e), (f), and (g), above.

**BASF objects to this Request in that it is overbroad and burdensome. See infra.**

- j) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.

**BASF objects to this Request in that it is overbroad and burdensome. See infra.**

**See attached SOURCE OF INFORMATION for the identification of each document that was consulted in developing this response and may contain more detailed information, and/or is related to this Request, as required by the Instructions.**

- 15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

**Nan Bernardo, Esq. (973 426-6006) and Caroline Hudson, Paralegal, (973 462-3009) of BASF Corporation, upon review of extensive documentation as set forth in the SOURCE OF INFORMATION, prepared these responses. Neither has personal knowledge of these Responses.**

BASF Corporation

May 1, 2003 Response to Information: Lower Passaic River Study Area

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**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**

State of New Jersey

County of Morris:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete and that all documents submitted and/or identified herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request For Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

**NAN BERNARDO**

NAME (print or type)

**ATTORNEY**

**BASF CORPORATION**

**3000 Continental Drive – North**

**Mt. Olive, NJ 07828-1234**

TITLE (print or type)

*Nan Bernardo*

SIGNATURE

Sworn to before me this 2 day of May, 2003

*Barbara Pierson*

**BARBARA PIERSON**

**A NOTARY PUBLIC OF NEW JERSEY**

**MY COMMISSION EXPIRES MAY 2, 2005**

**844230052**



Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
1	1997 Dames & Moore "BASF Corporation 1.0 Introduction" excerpt broad site history, former owners, remediations
1	5/29/92 "Site History Former Inmont Facility 150 Wagaraw Rd. Hawthorne, New Jersey" prepared for United Technologies Corporation by Baker Environmental, Inc.
1	7/22/93 [reference date] Handwritten notes re 7/22/93 D. Webster to J. Wehman "Hawthorne, New Jersey RCRA Status" report and points for consideration.
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 132: re Vol 2 of 4 GIS by prepared by Lan Assoc. "Inmont sold its organic chemicals division to Aceto Chemicals in 1967."
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 146: doesn't recall discussions about Weidman Dye Company using the site to dump bad batches re Exhibit 8
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 152: Exhibit 9 5/13/85 Lan Associates 2-page memo. Doesn't recall, as stated in the memo, that he said the entire area had been used for dumping of waste from the Paterson Dye Works.
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 155 –156: re Exhibit 10 doesn't recall stating "...currently, we no longer handle any solvent of a dangerous nature, of a hazardous label, or a red label type."
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 31: BASF sold Ink business to Sun Chemical in 1991
1	10/11/00 A. Gegis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 21-22: Dyestuffs manufacture ceased in 1974 with sale of intellectual property to Sandoz; manufactured in Bldg 5 & 6
1	5/21/86 P. Arvidson to M. Schneidermeyer, UTC enclosing draft of notification to ECRA officials of plant closing time frame. Attachment: Undated draft to NJDEP "ECRA Case No. 85563 Inmont Hawthorne Facility" attaching 5/14/86 press release to announce anticipated closing sometime within the coming 6 month period.
1	1/21/88 O'Brien & Gere to J. Gebrian "Decommissioning/ Demolition Specifications for your review" "Location of the Property Description of the Work BASF Corporation Inmont Site Hawthorne, New Jersey " includes Site Plan with legend that identifies buildings, their use, storage areas, sewer locations
1	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility Stormwater Discharge Elimination" seeking elimination of NJPDES DSW.
1	4/5/91 O'Brien & Gere to D. Webster BASF Corporation Hawthorne, New Jersey Facility – Investigation of RCRA Storage Areas and Transformer Area PCBs presence in transformer area, xylene in UST with marginalia
1	5/19/89 K. Koneval Draft to NJDEP " BASF Corporation - Inmont Site Hawthorne, New Jersey RCRA Underground Storage Tank"
1	6/13/89 K. Koneval to NJDEP "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal" enclosing Standard Reporting Form and Site Assessment Compliance Statement
1	6/15/90 K. Koneval memo to J. Poff, D. Webster, U. Soenksen, R. Cawley, W. Mock, C. Grigsby, R. Trinks "Hawthorne ECRA" attaching copy of NJDEP approval of BASF Negative Declaration for Hawthorne ECRA Case #87117.
1	Undated hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Bldg. 10; Storage Pad; with attachment: 6/22/89 Envirotech Research, Inc Report
1	7/10/92 Don Smith memo requesting that NLG Printing Plates Business (Carteret, NJ) be allowed to use Hawthorne for approximately 18 months; 7/20/92 approval from Larry Jameson
1	7/10/92 Don Smith memo requesting that NLG Printing Plates Business (Carteret, NJ) be allowed to use Hawthorne for approximately 18 months; 7/20/92 approval from Larry Jameson
1	10/89 O'Brien & Gere "ECRA Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ BASF Corporation October 1989"
1	5/24/91 W. Mock fax to S. Roland, of O'Brien & Gere re draft RCRA Closure Summary Report with handwritten revisions

**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
1	1/7/99 "DRAFT Hawthorne Timeline" UTC ownership passing to BASF Remediation 'Hawthorne Site January 7, 1999 Borough Committee Meeting" slide "Operational History"
1	1999 Undated "Standby Statement: BASF Hawthorne, NJ Site" Announcement that BASF and Borough personnel met to discuss vacant property – includes partial site history
1	2/3/99 Borough of Hawthorne to B. Pearson "Future of Hawthorne Committee Minutes" [January 7, 1999] Presentation by BASF Hawthorne Site history, remediation, plans to sell property
1	Undated "Former Inmont Facility Hawthorne, Passaic County ISRA #85563 Chronology Summary"
1	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
1	12/82 "Preliminary Evaluation of Groundwater Conditions at Inmont Corporation's Plant" dated December 1982 prepared by Geraghty & Miller, Inc.
1	5/12/87 fax History of Hawthorne
1	5/21/90 "SSPA II Cleanup Plan for Former Inmont Corporation Facility Hawthorne, NJ ECRA Case No. 85563" prepared by Fred C. Hart Associates, Inc.
1	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
1	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Closure Summary EPA ID #NJD 002165371"; RCRA Closure Report
1	9/13/85 Lan Associates Inc. "General Information Submission (GIS) and Site Evaluation Submission (SES) United Technologies Corp. / Inmont Corp. Hawthorne Facility" ECRA submissions
1	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
1	12/19/86 "General Information Submission BASF Corporation, Chemicals Division Hawthorne Facility" submitted to NJDEP ECRA Notice Submission
1	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
1	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
2	2/27/92 NJDEPE correspondence to BASF Corporation "Inmont Corporation Hawthorne, Passaic County NJPDES Permit No. NJ0002453 " responding to BASF 4/22/91 request for modification to NJPDES Permit No. NJ0002453.
2	1/1/91 R. Trinks to NJDEPE re "NJPDES Permit No. NJ0002453 " responses to excursions noted during 11/30/90 inspection
2	1/10/90 O'Brien & Gere "BASF Corporation Hawthorne, NJ Facility – Meeting Minutes" meeting to discuss stormwater compliance evaluation
2	1/5/93 K. Killeen to NJDEPE "BASF Corporation - Hawthorne Site /NJPDES Permit No. NJ0002453 " responding to deficiencies in 12/9/92 Inspection Report result from circumstances beyond BASF control, namely that the cessation of operations resulted in the discharge of stormwater alone.
2	11/2/89 R. Trinks to NJDEPE re "Stormwater Discharge from 150 Wagaraw Road Hawthorne NJPDES Permit No. NJ0002453 "
2	12/2/91 R. Trinks to NJDEPE re "NJPDES Permit No. NJ0002453 Compliance Evaluation Inspection" BASF responses re 10/16/91 Site Inspection and to 11/15/91 letter
2	12/27/93 NJDEPE to BASF re "Compliance Evaluation Inspection BASF Corporation - Chemicals Division NJPDES Permit No. NJ0002453 Class: MIN-IND-DSW Munic./County: Hawthorne Borough, Passaic County"
2	12/28/92 P. Webb to NJDEPE re response to NJDEPE 12/14/92 letter clarifying information re noncompliance, request to reconsider parameters of [NJPDES Permit No. NJ0002453 ]
2	2/19/93 J Larry Jameson [BASF Pres Coatings & Colorants Division] to Honorable Scott A. Weiner, NJDEPE, Office of the Commissioner "BASF Corporation/Hawthorne " requesting meeting to resolve the permitting issue that has remained undecided for 6 years [NJPDES Permit No. NJ0002453]
2	3/7/85 NJDEP to W. Mock "NJPDES Permit No. NJ0002453 Effective Date: May 1, 1985" enclosing Final NJPDES /DSW Permit and Notice of Authorization to discharge pollutants to Passaic River...
2	4/18/94 P. Webb to P. Rubbe re "Hawthorne Inspection – April 18, 1994" purpose of NJDEPE inspection to allow State inspector to propose revocation of existing NJPDES Permit No. NJ0002453 and application for general stormwater discharge permit. "

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
2	5/14/93 K. Killeen to B. Leiken re "Hawthorne , New Jersey Site" Summary of 4/15/93 meeting agreements re water permitting issues.
2	6/14/94 NJDEPE to P. Webb re "BASF Corporation Hawthorne Borough, Passaic County NJPDES Permit No. NJ0002453 NJPDES Permit Revocation" enclosing draft Revocation Notice, Public Notice and Fact Sheet (not attached) notification of NJDEPE intention to revoke permit
2	6/21/94 I. Polyak to R. Awn re "Hawthorne – Final Notice of Nonresponse" Stormwater NJPDES Permit Program staff member corrected problem that caused the Final Notice of Nonresponse to be mailed; issue considered resolved; attached: Final Notice of Nonresponse received 6/2/94 with 10/18/93 NJDEPE to BASF Corporation "Minor Modification NJ000245"
2	7/14/93 P. Webb to NJDEPE re "Request for General Permit Authorization (RFA)" enclosing completed and signed request for Hawthorne, New Jersey facility that closed in 1986
2	8/25/93 P. Webb to NJDEPE re "Application for Termination of BASF Corporation – Hawthorne Facility NJPDES Permit No. NJ0002453 Hawthorne Borough, Passaic County" enclosing completed application re non-contact cooling water discharge
2	8/5/94 NJDEPE to P. Webb re "BASF Corporation Hawthorne Borough, Passaic County NJPDES Permit No. NJ0002453 NJPDES Permit Revocation" enclosing Final Revocation Notice NJPDES Permit No. NJ0002453 and authorizing stormwater discharge under general permit NJPDES Permit No. NJ0088315; attached 10/1/94 NJPDES Permit No. NJ0088315, Stormwater Pollution Prevention Plan Preparation Certification, Stormwater Pollution Prevention Plan Implementation and Inspection Certification, 2/94 Industrial Stormwater Pollution Prevention Plan Guidance
2	L. Mellen [BASF Group Controller] to NJDEPE responding to NOV issued following 12/2/92 site inspection. Attached: 12/2/92 NOV "none of the COD or TSS violations were 'Serious' violations as defined by the Act."
2	10/17/85 Inmont Environmental Bulletins Waste Management Bulletin "
2	3/6/96 Brian Diepeveen to NJDEPE re "General Stormwater Permit Hawthorne, 150 Wagaraw Rd., NJ 07506" completed 4 quarterly inspections, submitting attached "Attachment D" Stormwater Pollution Prevention Plan Implementation and Inspection Certification.
2	1/3/85 P. Mock [United Technologies/Inmont Sr. Project Engineer] to NJDEP re "NJPDES Permit No. NJ0002453" reviewed and noted change to existing permit in current draft permit. "
2	11/20/89 [date received] NJDEP to R. Trinks re "NJPDES Permit No. NJ0002453 Facility Name: BASF Corporation County: Passaic Category (ies): C, 05"
2	3/7/85 NJDEP to P. Mock "NJPDES Permit No. NJ0002453 Effective 5/1/85" enclosing NJPDES/DSW Permit and Notice of Authorization to discharge pollutants to Passaic River. [expiration date 4/30/90]
2	4/15/93 NJDEPE to P. Rubbe "New Sampling Point for Discharge Serial Number (DSN)-001 NJPDES Permit No. NJ0002453 BASF Corporation Hawthorne, Passaic County"
2	4/4/94 B. Diepeveen to UTC re "Hawthorne RCRA/ECRA Issues" per 3/29/94 meeting BASF requesting "UTC address any actual or potential soil and/ or groundwater contamination related to the former RCRA UST as part of its ECRA program." Enclosing NJDEPE correspondence re same; 8/93 NJDEPE to D. Webster "Request for Permit Termination – DGW Closure/Post-Closure Section of NJPDES DSW/DGW Permit NJ0002453 BASF Corporation - Hawthorne Site; Passaic County, New Jersey"
2	6/18/93 P. Rubbe to P. Webb, J.. Wehman "Hawthorne Permit Termination"
2	Undated "Application to Discharge Wastewaters and residuals to the State's Land and Water" Renewal includes amounts of Passaic River water used for specific processes to be discharged back to river; "Required Statement ...The intake water is not treated in any way prior to discharge"; "Hawthorne Water Usage" flow chart of city and river water usage and amounts to specific areas/processes, and discharge locations (Sanitary Sewer or Passaic River)
2	Undated NJDEP to UTC (Former Inmont Corporation) BASF Corporation Hawthorne Borough, Passaic County, NJPDES Permit No. NJ0002453 " enclosing draft NJPDES/DGS permit – Fact Sheet for Hawthorne Site, groundwater flow is to Passaic River
2a	10/17/85 Bulletin Waste Management: "As of August 5, 1985 all sites generating more than 100 kg (less than one drum) of waste per month, must obtain an EPA ID number."
2b	1/13/89 T. Szelest to NJDEP "1989-90 New Jersey Pollutant Discharge Elimination System (NJPDES) Permit Fees"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
2b	11/18/85 Arvidson memo to Burachinsky "Hawthorne Environmental Review" R. Trinks 11/18/85 memo attachment "II River Water – Spill Control" usage of river water – non-contact water cooling water and storm water runoff are discharged to Passaic River under NJPDES permit #NJ0002453; effluent sampling results
2b	2/19/97 NJDEP to BASF Corporation "Termination of Authorization under NJPDES General Industrial Permit No. NJ0088315, A-008868, BASF-Hawthorne Facility" granting termination of permit
2b	7/18/89 H. Hintz, Jr. to R. Trinks "Hawthorne NJPDES Permit Renewal" attached: 6/12/89 NJDEP to Inmont Corp. "NJPDES Permit Expiration 900430 NJPDES Permit No. NJ0002453 Category: C – Thermal SW Discharge County: Passaic"
3	3/14/90 O'Brien & Gere to D. Webster "Inmont Site Hawthorne Facility UTC Cleanup Plan Review"
3	Undated notes "Hawthorne" asking "Why TPH @ PCB transformer" if objective of "task #3" is to determine presence of xylene, fewer samples, six samples already taken around PCB transformers
3	6/13/89 K. Koneval to City of Paterson, Division of Health re "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal"
3	2/6/98 Calendar "Daily Record of Events" Hawthorne PCBs conversation with Dave Hannemann, EPA; [BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint]
3	5/29/92 "Site History Former Inmont Facility 150 Wagaraw Rd. Hawthorne, New Jersey" prepared for United Technologies Corporation by Environmental, Inc.
3	10/11/00 A. Gaggis testimony in re <u>UTC v. American Home Assurance</u> at pages 157-159: DCB explosion in 1980
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 110 – 111: Benzene
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 120-124: chemicals used at Hawthorne Plant
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 127-130: chemicals used at Hawthorne Plant
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 135: re Vol 2 of 4 GIS by Lan Assoc. – products manufactured
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 149-150: use of solvents
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 152: no recollection of chromium spill re Exhibit 8
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 52: Toluene used at Hawthorne
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 53: Xylene used as a cleanser
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 56: Lead was brought to the plant as a lead nitrate, not a pure lead. It was a constituent of a red pigment called phloxine. Inmont stopped manufacturing phloxine in the early 1970s because of the lead content.
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 57: cadmium not used
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 57: chromium was contained in pigments brought onto site, not use after 1976-77 when textile operations were relocated in the south
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 58-59: PCBs in transformers outside buildings 4 & 6
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 59-63: PCBs were by-products in the manufacture of diarylide yellow and phthalo blue.
3	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 84-85: solvents

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
3	1/21/93 Baker Environmental, Inc. to NJDEPE re "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
3	4/12/89 B. Zollner to K. Koneval re "Hawthorne Transformers / PCB"
3	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
3	7/18/89 NJDEP to K. Koneval responding to BASF 6/22/89 letter re disposal of 105 cubic yards of Passaic River silt contaminated with small quantities of dioxin. Attachment: 7/6/89 NJDEP internal memo "Disposal of Solid Waste at a Hazardous Waste Facility"
3	8/1/86 "Hawthorne closure Plan Summary Sheet – August 1, 1986 150 Wagaraw Road Hawthorne, NJ EPA ID# NJD002165371" "temporary stores hazardous waste in one 3,000 gallon underground tank and a maximum of 60 – 55 gallon drums."
3	9/18/87 NJDEP notice to BASF Corporation that initial payment was underpaid; waiting for: "RCRA Closure Plan for 3000 gal. xylene waste tank;" "Excavation of Tank Farm #2" "identification of hazardous waste transporters"
3	Undated D. Webster to Phil [Phil Webb] excerpt from O'Brien & Gere report chart "PCB Analytical Summary" explanation for the 56 ppm reading in soil near RCRA pad
3	1/12/89 O'Brien & Gere: Log Sheets hand drawn sketches of tanks, notations re tanks, product lines, sewer impact; attachment: 1/20/86 SRS, Inc. invoice
3	1/14/91 D. Webster to UTC confirming decisions arrived at during a "recent meeting" including responsibilities for: tank removal, PCB impacted soil, storm drainage ditch, etc.
3	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
3	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
3	1/16/90 D. Webster draft to UTC re "PCB Transformer Area at Hawthorne"
3	1/16/90 K. Koneval to NJDEP re "BASF Coatings and Colorants Facility in Hawthorne, New Jersey, Hazardous Waste Facility Annual Report for 1988, EPA ID #NJD 002165371"
3	1/21/88 O'Brien & Gere to J. Gebrian re "Decommissioning/ Demolition Specifications for your review"; "Location of the Property Description of the Work BASF Corporation Inmont Site Hawthorne, New Jersey" includes Site Plan with legend that identifies buildings, their use, storage areas, sewer locations
3	1/28/89 W. Mock fax to K. Koneval materials sent via registered mail from Gus Gaggis to USEPA Region II including schematics of Hawthorne Boro, schematic drum storage and UST; 1980 Hazardous Waste Permit Application
3	1/8/90 K. Koneval memo to J. Poff [in-house counsel] "Hawthorne – UTC ECRA" attaching UTC / Fred C. Hart Associates. Inc. letter to NJDEP enclosing 12/13/89 Supplemental Sampling Plan Addendum II for Former Inmont Facility Hawthorne, New Jersey & prepared for UTC
3	1/8/92 Baker Environmental, Inc. to UTC "Proposal to Investigate Soils in the Former RCRA Storage Areas at BASF's Hawthorne, New Jersey Property"
3	10/13/88 W. Mock to U. Soenksen re "Bldg 6a Pigment Contamination/ Storm Sewer 10/10/88" reporting spill
3	10/13/88 W. Mock to Passaic Valley Sewer Commission [PVSC] "Temporary Storm Sewer Diversion 14404910-31058-0141"
3	10/19/88 ETC Findlay Laboratory Analytical Report including PCBs
3	10/22/90 A. Gillen memo to U. Soenksen "Hawthorne" recommending removal of PCB contaminated transformer, compliance with discharge permit
3	10/26/88 O'Brien & Gere to W. Mock re "RCRA Closure Plan Analytical Summary" UST, former hazardous waste pad,
3	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved: 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA

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Request No.	Identification and Description of Responsive Document
3	10/9/89 Lowenstein Sandler to NJDEP "DGW Closure/Post-Closure NJPDES Permit NJ0002453; BASF Corporation-Chemicals Division: Hawthorne, Passaic County" attachment: 8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
3	10/9/90 W. Mock memo to R. Trinks re "Main Power Transformer Mat PCB Remediation"
3	11/1/95 B. Diepeveen fax to G. Gagis of Geotrans, Inc.: re "Mercury and Lead Delineation at BASF/UTC Site"
3	11/3/93 UTC to NJDEP re "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
3	11/6/91 D. Webster memo to U. Soenksen, J. Poff [in-house counsel] "Summary of Meeting with UTC November 1" UTC met with NJDEPE ECRA case manager to discuss contamination
3	12/16/ [notes do not have year-only month and day] Handwritten notes "Area 3" sampling procedures to be followed for historic fill on Merck property
3	12/4/89 O'Brien & Gere to K. Koneval "BASF Corporation Hawthorne, New Jersey Facility – Technical Approach": proposal for remedial options, addressing certain areas, such as PCB contaminated soil, former RCRA drum storage pad, storm sewer –fluorescein discharges, etc.
3	2/26/91 UTC to D. Webster re Cleanup levels established for soils at Hawthorne, New Jersey facility.
3	3/17/92 D. Webster to UTC re "Baker Engineering's Proposal Investigation dated 1/8/92" requesting Baker be authorized to commence activities describe in their 1/8/92 proposal and also to include PCB analysis in RCRA tank area, and characterization of Tank Farm #2 soil pile.
3	5/11/95 J. McKeon to P. Rubbe "Incident 19512501" attachment: 5/11/95 J. McKeon to NJDEP "Discharge Confirmation" "Types of Hazardous Substances Discharge - Not Hazardous Substance" "Quantity of Substance Discharged – About two ounces fluorescein dissolved in storm and dust control water" and photos
3	5/19/89 K. Koneval Draft to NJDEP re "BASF Corporation - Inmont Site Hawthorne, New Jersey RCRA Underground Storage Tank"
3	5/3/90 [fax machine date 5/3/91] W. Mock fax to D. Webster requesting that UTC be persuaded to remove loose asbestos fuel oil house and also pipe covering steam line ceiling of river water pump hosed adjacent to ground reservoir.
3	5/6/86 A. Schneid to NJDEP "Registration of Underground [Underground] Tank Currently Being Removed" attachment: Completed NJDEP Form "Underground Storage Tank Registration Questionnaire"
3	6/13/89 K. Koneval to NJDEP re "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal" enclosing Standard Reporting Form and Site Assessment Compliance Statement
3	6/16/89 K. Koneval to NJDEP re "BASF Corporation - Hawthorne, New Jersey Solid Waste (Riversilt) – Class ID 27"
3	6/16/92 Baker Environmental, Inc. to Troy Charlton,[UTC] re "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
3	6/16/92 Baker Environmental, Inc. to Troy Charlton, [UTC] re "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
3	6/23/90 K. Koneval to NJDEP "Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371"; responding to 4/23/90 letter.
3	6/24/94 EPC Technologies, Inc. "Asbestos Air Monitoring Report BASF Corporation Former Inmont Facility Hawthorne, New Jersey" with results
3	6/26/91 D. Webster to NJDEP "Permit Termination Request; NJPDES Permit No. NJ0002453"
3	6/3/96 Merck to B. Diepeveen enclosing proposed access agreement & plot plan [neither attached] and scope of work re excavation of Passaic River sediment, which have shown elevated levels of lead and mercury.

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Request No.	Identification and Description of Responsive Document
3	7/10/95 B. Diepeveen to K. Killeen "Site Access to Merck - Hawthorne Site" attaching Merck's request to delineate soil contamination along property line.; attachment: 6/29/95 Merck to B. Diepeveen "Access to Hawthorne site for sampling": attached grouping: 1) Fred C. Hart Associates, Inc. "Soil Boring and Soil Sampling Locations; 2) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 3) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 4) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant" locations of perimeter borings; 5) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"
3	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan; attachment: Townley Research and Consulting, Inc. sampling analysis; attachment: O'Brien & Gere log sheet noting PCB Sample locations and readings; attachment: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attachment: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
3	7/17/95 P. Mock to File "Hawthorne – Final Work Scope" Items to be completed based on walk-through; attachment: schematic of plant
3	7/18/89 W. Mock memo to K. Koneval "Elimination of Building 10 Transformers Letter W. W. Mock \ K. C. Koneval – 7/1/89"
3	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
3	7/23/93 W. Mock handwritten notes re Bldgs 17 and 18 river pumps
3	7/5/89 NJDEP to Lowenstein Sandler "DGW Closure/ Post closure Section of NJPDES Permit No. NJ0002453 BASF Corporation – Chemicals Division; Hawthorne, Passaic County"
3	7/7/89 W. Mock memo to K. Koneval "PCB Transformer Site Remediation" with attachment: 6/30/89 Advanced Environmental Technology Corporation (AETC) letter recommending removal and disposal of transformers re PCB contamination
3	8/19/86 D. Webster to NJDEP providing notification of intent to close UST
3	8/26/92 D. Webster to Hawthorne File "Phone Conversation with Troy Charlton [UTC] – 8/25/92" UTC status meeting with NJDEP
3	8/8/91 D. Webster to NJDEP "Follow-up to Meeting of July 31, 1991" enclosing copy of 6/1/89 Closure Summary Report for the RCRA Units at BASF's Hawthorne Facility. [not attached as indicated].
3	9/16/88 W. Mock to K. Koneval "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere"
3	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
3	9/27/88 U. Soenksen "Preliminary Spill Report re Hawthorne, NJ Site" report of events leading up to, and including spill, truck driver error
3	9/28/87 BASF Corporation to NJDEP re "Amendment No. 1 – Closure Plan for Hazardous Storage Area and Underground Tank BASF Corporation - Inmont Site, Hawthorne, New Jersey (EPA ID# NJD00216537"
3	9/29/88 W. Mock to U. Soenksen re "Bldg. 6 Pigment Pit Sludge Spill 9/26/88"
3	Undated hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Bldg. 10; Storage Pad "; attachment: 6/22/89 Envirotech Research, Inc report
3	8/23/82 Inmont's Petition from Exemptions from Bans on Processing and Distribution in Commerce of Pigments and Derived Materials Containing More than 50 ppm PCBs
3	11/15/85 Emergency Services Information Survey (ESIS)- Hawthorne hazardous substances
3	1/20/83 NJ Environmental Protection Hazardous Waste Facilities Annual Report 1981
3	1/26/83 Complaint, Compliance Order, and Notice of Opportunity for Hearing
3	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste Generator/Transporter information.
3	4/3/86 Inmont to NJDEP re Corrective Actions on deficiencies reported; hazardous waste tank scheduled for removal



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Request No.	Identification and Description of Responsive Document
3	5/19/72 Schneid memo to Bowers re "Organic Textile Systems Involved with Rule 66" rough estimates of use of aromatics in manufacturing, and rough total production amounts.
3	6/27/85 letter to USEPA Amendment to original Part A Hazardous Waste Application submitted 11/80
3	9/17/81 Letter to Document Control Officer, Office of Pesticides & Toxic Substances – Confidentiality Requested - re PCB Generation and Control in Pigment manufactured by Inmont Corp. describes the process by which certain pigments are manufactured with PCBs as an unintentional by-product, typically <50ppb. "[page 4] (4) Its presence is almost negligible in the waste effluent."
3	Undated Table 1 Attachment to 5/7/86 memo Tank Farm No.2 [tanks 2 & 6 contained Solvesso, tank 9 contained xylene]; a "Hazardous Waste Tank" contained waste xylene and remained inground.
3	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes." About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook.
3	10/27/86 Arvidson memo to Jameson re "Inmont Division PCB Compliance" PCB-contaminated transformers are permitted and properly maintained
3	11/18/85 Arvidson memo to Burachinsky re "Hawthorne Environmental Review" R. Trinks 11/18/85 memo attachment "II River Water – Spill Control " usage of river water – non-contact water cooling water and storm water runoff are discharged to Passaic River under NJPDES permit #NJ0002453; effluent sampling results
3	2/17/87 K. Hillig to W. Bruner, R. Dusche "Hawthorne – PCBs in Transformer Oil" sampling results
3	4/19/83 Environmental Survey of Hawthorne Plant II
3	4/23/82 Factory Mutual Engineering Association Plot Plan United Technologies Corp., et al. Inmont Corp. Hawthorne, N.J. Serial 91147 Index 30445.22 surveyed by M.G. Woodward [Tank 9 contains 3,000 gallons xylol]
3	4/23/85 P. Mehta to R. Trinks "Status of PCB related Problems of Major US Locations" Hawthorne's transformers removed from service and disposed of properly.
3	5/23/83 memo New York Testing Laboratories, Inc. lab analysis of a dried pigment sample
3	7/14/81 Environmental Survey Review Hawthorne Plant
3	9/10/85 Emergency Services Information Survey (ESIS)-Hawthorne hazardous substances
3	Hawthorne Tank Farm #1 includes toluene as an inventory item in 1970
3	Undated handwritten note re PCBs
3	Undated handwritten note re PCBs"
3	1988 BASF PCB Audit Report
3	10/30/90 D. Webster to NJDEP enclosing 6/23/90 letter to NJDEP – Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371
3	10/89 O'Brien & Gere "ECRA Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ BASF Corporation October 1989"
3	3/24/95 Baker Environmental, Inc. "Summary of PCB Area Remedial Action Former Inmont Corporation Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 585563"
3	1/10/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" waste profile sheets prepare and sent to waste disposal facilities
3	1/12/89 O'Brien & Gere Log Sheets with hand drawn sketches of tanks, notations re tanks, product lines, sewer impact; attachment: 1/20/86 SRS, Inc. invoice
3	1/13/89 Hawthorne Decommissioning Progress Report #13: 12/15-31/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	1/20/89 Hawthorne Decommissioning Progress Report #14: 1/1-15/89 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	1/26/89 O'Brien & Gere meeting Notes "BASF Corporation Inmont Site Hawthorne, NJ NJDEP/ECA Meeting Minutes" purpose to provide status of Decommissioning and Demolition.



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Request No.	Identification and Description of Responsive Document
3	1/5/88 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen "NJDEP Permit" attachment: 12/24/87 NJDEP TO J. Gebrian "Response of comments and Issuance of Final Major Modification of NJPDES DSW Permit NJ0002453" re closure of an underground hazardous waste storage tank.
3	10/11/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" BASF rejected OHM proposal to recycle wood, and indicated it was be sent to a transfer station, or if found hazardous, to a secure landfill. Building 18 filter tank sludge test results not yet available. [results later showed dioxin contamination of Passaic River silt]
3	10/21/88 Hawthorne Decommissioning Progress Report #8: 10/1-15/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	10/5/88 Hawthorne Decommissioning Progress Report #7: 9/15-30/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	10/9/89 Lowenstein Sandler to NJDEP "DGW Closure/Post-Closure NJPDES Permit NJ0002453; BASF Corporation-Chemicals Division: Hawthorne, Passaic County" attachment: 8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
3	11/16/89 W. Mock handwritten "PCB Dirt" Shipping date, CWMA Manifest #; Amounts, Dest. Emelle, AL
3	11/22/88 "Phone Conversation with [D.B. Kelley] J.R. Kelley and T. Whie: Information discussed with J. Sorena [security guard who poured oil into sewer]"
3	11/29/88 Hawthorne Decommissioning Progress Report #10: 11/1-15/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	11/7/88 Hawthorne Decommissioning Progress Report #9: 10/16-31/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	11/9/88 O'Brien & Gere to File "Job Coordination Meeting" page 2, at 6. "OHM its sources of knowledge relative to past contamination of the Passaic River and indicated the following: a. O.H. Materials identified a fish ban in the Passaic River due to a chemical contamination of the river sediment." BASF also requested that OHM provide all public records relative to previous contamination of Passaic River. [results showed dioxin contamination of river silt]
3	11/9/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" page 2, "7. Filter House Material BASF requested the information pertaining to O. H. Materials' decision to test for dioxins. BASF instructed the Contractor to provide all public record information currently existing on the Passaic River contamination with dioxins."
3	12/13/88 Hawthorne Decommissioning Progress Report #11: 11/15-30/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	12/30/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" OHM to continue to remove hazardous debris, meeting scheduled to discuss Buildings. 17 & 18 filter debris results showed dioxin contamination of river silt
3	12/7/89 O'Brien & Gere to Hart Environmental Management Co. Envirotech Research Inc. 6/22/89 analytical results Soils excavated from former RCRA Drum Storage (PCBs)
3	2/10/89 Hawthorne Decommissioning Progress Report #15: 1/15-31/89 highlights and summarizes the individual building status, including storage, transport & disposal of hazardous waste
3	2/23/89 Hawthorne Decommissioning Progress Report #16: 2/1-15/89 highlights and summarizes the individual building status, including storage, transport & disposal of hazardous waste
3	3/22/89 Hawthorne Decommissioning Progress Report #17: 2/15-28/89 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	3/30/94 rev 3/31/94 J. McKeon memo w/attachment to J. Poff "Hawthorne Facility – RCRA Status"
3	3/8/88 BASF Corp. PO retaining O'Brien & Gere for additional services re RCRA Closure - 3000 gal. underground hazardous waste storage tank as outlined in attached O'Brien & Gere 2/14/88 proposal
3	4/18/89 AETC to W. Mock enclosing analysis of 6 soil samples sent to Townly [Townley] re PCB
3	4/27/89 Handwritten W. Mock notes re PCB levels K. Hillig quotes re Townly readings; second sheet records PCB readings

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Request No.	Identification and Description of Responsive Document
3	4/4/89 Hawthorne Decommissioning Progress Final Report #18: 3/1-17/89 status report, highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	4/9/85 R. Trinks memo to W. Mock "Underground Hazardous Waste Tanks"
3	5/24/91 W. Mock fax to S. Roland, of O'Brien & Gere draft RCRA Closure Summary Report with handwritten revisions
3	6/3/91 O'Brien & Gere to W. Mock enclosing 6/1/89 submission to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Closure Summary Report EPA ID #NJD002165371
3	6/7/88 O'Brien & Gere to File re "BASF Inmont Preconstruction Meeting" page 3, #37 "BASF informed the Contractor that Freon 22 is being stored on site. Its final disposition has not been determined."
3	7/12/88 O'Brien & Gere "BASF Inmont Job Coordination Meeting" #4. freon stored at Building. 31 has not been removed from the site. BASF will be responsible for the final disposal..."
3	7/17/87 W. Mock to O'Brien & Gere enclosing RCRA Closure Plan; attachment: 7/13/87 D. Webster fax to J. Gebrian of 7/8/87 NJDEP review of Closure Plan; attachment: 9/3/86 handwritten Sign In Sheet for Hawthorne RCRA Closure Meeting with BASF Inmont and NJDEP personnel; attachment: 8/19/86 D. Webster letter to NJDEP outlining reasons that BASF believes groundwater monitoring for the underground hazardous waste storage tank is not warranted; attachment: 8/11/86 D. Webster to NJDEP enclosing the Alternative Information Statement re notification for changing the facility's name, Closure Plan including provisions for the underground hazardous waste storage tank and drum storage area. ]
3	7/19/88 C.R. Evans to U. Soenksen "Hawthorne Decommissioning Status Update". "During the removal of this unit [in Bldg. 25], the transformer fell on its side and oil containing 49 ppm PCBs was spilled. OHM personnel immediately cleaned up the spill. This occurred on the waste treatment pad."
3	7/20/88 Hawthorne Decommissioning Progress Report #2: 7/1-15/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	7/21/88 OHM to W. Mock "Six Electrical Transformers Containing PCB Oil" - dismantling, handling and disposal related procedures
3	7/26/88 B. Handog handwritten to W. Mock "Bulk Asbestos Analysis" none detected by Laboratory Testing Services
3	8/16/88 K. Koneval memo to W. Mock "Disposal of PCB's" attaching EPA list of companies approved for disposal of PCBs
3	8/16/88 O'Brien & Gere memo to File "BASF Inmont Job Coordination Meeting" modifications: OHM to accept responsibility for disposal of building rubble at landfill; BASF decided that trays outside Bldg. 6A to be disposed of as hazardous waste; all PCBs to be removed from plant within 7 days to appropriate site
3	8/23/88 R Doerfler Handwritten Notes Omega Chemical in CA will take freon to reprocess "check with Environmental to see if they're legit." AETC waiting to hear from DuPont
3	8/25/88 Hawthorne Decommissioning Progress Report #4: 8/1-15/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	8/30/88 C. R. Evans to U. Soenksen "Hawthorne decommissioning Status Update" UST removed, samples taken
3	8/9/88 Handwritten Notes #4. PCB –label properly & ship by 8/29/88 also trans [transformers]; 8. "location of PCB's – A.S/G.G. [Al Schneid/Gus Gaggis] with attached Sign In Sheet, also 8/9/88 Waste Classification Background Meeting
3	8/9/88 O'Brien & Gere to File "BASF Inmont, Waste Classification Meeting" procedures to ensure hazardous materials is classified properly and that the appropriate manifests are prepared, and confirmation sampling conducted and reported, transformer oil [PCB] disposal due date
3	9/16/88 Hawthorne Decommissioning Progress Report #5: 8/15-31/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	9/16/88 W. Mock to K. Koneval "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere" attachment: 10/26/88 O'Brien & Gere Analytical Summary former hazardous waste storage tank, and hazardous waste storage pad

**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
3	9/20/88 Hawthorne Decommissioning Progress Report #6: 9/1-15/88 highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste
3	9/21/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting –9/21/88" freon stored in Bldg 31 to be disposed of by BASF subcontractor; "8. It was identified by the O'Brien & Gere on-site field representative that the ballasts in the fluorescent fixtures is claimed by the manufacturer to contain PCB's. These ballasts will be disposed of as a hazardous waste."
3	9/4/87 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen, O'Brien & Gere "Hawthorne" enclosing draft permit for DGW re closure of hazardous waste tank.
3	9/88 Agenda [for BASF Inmont Job Coordination Meeting ] Bldg. 31 freon and T&D for RCRA Tank/Former Hazardous Waste Storage Tank Soil
3	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
3	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
3	2/22/86 Canonie Engineers to W. Mock "Proposal Partial Tank Farm decommissioning API Ink division Hawthorne, New Jersey"
3	5/19/86 Canonie Environmental 5/19/86 to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank; attached memos: 4/3/86 to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning; 8/25/88 W. Mock memo to K. Koneval "Removal of Underground Tanks – Tank Farm #2 – Building 4"; 5/27/86 P. Arvidson fax to W. Mock to review Triolo 5/7/86 memo; 5/7/86 Triolo memo to file re "BASF/Inmont, Hawthorne, NJ – Underground Tanks Excavation, Soil Sampling and Observations"; 5/28/86 P. Arvidson to Fred C. Hart Associates Inc. response to 5/7/86 Triolo memo; 5/1/86 R. Trinks memo to W. Hanzl "Underground Tank Removal Program / Hawthorne"
3	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
3	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
3	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
3	6/14/91 D. Webster letter to NJDEP re ECRA Statement re Building 10 Transformers at Hawthorne Site concentrations tested as high as 4074 ppm. "The PCB concentrations in the soil would seem to indicate that the PCBs in the soils came from sources that predate BASF's ownership (1985)."
3	Inmont Binder lists processes and chemicals used
3	5/11/83 United Technologies Inmont – Analysis and Testing Services Dept. Central Research Laboratories B. Handof to A. Schneid "EPA EP Toxic/Pigment from Dust Collectors with attached results from New York Testing Laboratories, Inc. 5/9/83 report on Dried Pigment Sample
3	8/5/85 Blanchfield memo to Schneid attaching 7/23/85 NJDEP acceptance of proposed changes to Part A Application for hazardous waste facility ; drum storage area increase; drum storage pad specifications; storage tank volume corrected; hazardous waste added [chromium, lead]
3	1/15/99 NJDEP to UTC "response to the NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) dated October 29,1998" including Inmont requests for no further action former process sewer lines, and AECs for which further action required per 8/18/98 letter
3	1/28/99 Philadelphia Office to Brian Diepeveen "BASF -Hawthorne ; PR-14 PCBs"
3	10/29/98 Brian Diepeveen to NJDEP "Response to NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) – Former Inmont Facility Hawthorne, Passaic County: ISRA Case No. 85563" responding on behalf of UTC
3	12/29/97 USEPA Region II to Jim Poff In the Matter of BASF Corporation Docket No.: II TSCA-98-0107 with marginalia
3	1998 "TSCA Punch list" handwritten notes
3	1998 Handwritten notes background facts and research re BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint
3	2/11/98 "Chronology of Events regarding Management of PCB-Impacted Soil" attached: "Alternate Penalty Assessment Scenarios regarding Management of PCB-Impacted Soil"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
3	2/11/98 Calendar "Daily Record of Events" Mtg w/ EPA Edison TSCA PCBs notes, impressions, points presented
3	2/11/98 Dames & Moore Slide Presentation for 2/11/98 meeting with EPA with marginalia
3	2/11/98 handwritten notes analyzing BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint; additional notes & research
3	2/13/98 Brian Diepeveen e-mail to J. Poff "Hawthorne TSCA Complaint" Reporting results of 2/11/98 meeting with EPA
3	2/2/99 Dames & Moore to NJDEP "Scope of Work for remediation of PCB-Impacted Soil at Location PR-14; regarding Site Improvement Program at BASF Corporation's Hawthorne, New Jersey Facility (ISRA Case No. 85563)"
3	2/8/99 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563"
3	3/10/98 Brian Diepeveen to Waste Management, Inc. "BASF Hawthorne Site – TSCA Penalty"
3	3/19/88 K. Killeen to Dames & Moore claim notice re 12/1/94 Environmental Services and Remediation Agreement, and indemnification clause; in re [BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint]
3	3/26/88 Lowenstein Sandler to Stuart Keith, USEPA "BASF Corporation Docket No.: II TSCA-98-0107 " Answer and Request for Hearing filed to preserve client's rights, client prefers the offered alternative of informal resolution, and requests settlement conference; attached: Answer and Request for a Hearing on the Complaint
3	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Lead & PCBs detected in Soil beneath Proposed Demolition Contract Area"
3	3/28/97 Dames & Moore "Proposed Pre-Demolition Excavation Depths BASF Corporation Hawthorne, New Jersey" showing 3/97 Sample Analyses locations and excavation depths; PCBs in re[BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint
3	5/18/98 Dames & Moore fax to Brian Diepeveen 5/18/98 e-mail with PowerPoint Slides for upcoming meeting with EPA on 5/28/98; marginalia
3	5/6/95 Draft J. McKeon to P. Rubbe "Incident 19512501" 5-10 foot section of ground of green material that reportedly had come up out of the ground during demolition
3	6/17/97 IEA of New Jersey (An American Environmental Network Laboratory "AEN Inc.") to Dames & Moore Soil Samples PCBs BASF Waste Characterization
3	6/24/92 Baker Environmental, Inc. "Soil Remediation Summary United Technologies Corporation Hawthorne, New Jersey Tank Farm 2 Post-excavation Sample Locations"
3	6/4/97 Baker Environmental, Inc. fax to Brian Diepeveen information re characterization of soils containing xylene form 10/93 "Final Soil Cleanup Report" and Hazardous Waste Manifest
3	6/8/98 Lowenstein Sandler to Stuart Keith, Asst. Regional Counsel, USEPA "BASF Corporation Docket No.: II TSCA-98-0107" BASF voluntary "Site Improvement Project"
3	7/1/94 "The PCB Regulations" 40 C.F.R. Part 761 highlighted
3	7/24/97 Land Disposal Restrictions Notification and Certification Form completed by Brian Diepeveen , Waste Characterization Report 106837
3	7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved, attaching credit application for generator needed for billing purposes
3	8/28/97 B. Diepeveen to USEPA "BASF Hawthorne Site"– Follow-up Data for Multi Media Inspection Conducted August 18-21, 1997 [cover letter only]
3	8/4/97 Chemical Waste Management, Inc. CB6240 Waste Profile [waste profile only] PCBs
3	8/4/97 Paul to Brian D. [Brian Diepeveen] 7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved
3	9/10/80 Federal Register Vol. 45, No. 177 "Guidelines for the Assessment of Civil Penalties Under Section 16 of TSCA; PCB Penalty Policy" highlighted copy
3	Undated BASF Site Plan "Hawthorne Site Areas of Environmental Concern Figure 1"
3	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
3	5/21/90 "SSPA II Cleanup Plan for Former Inmont Corporation Facility Hawthorne, NJ ECRA Case No. 85563" prepared by Fred C. Hart Associates, Inc.

**Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests**  
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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
3	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
3	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Closure Summary EPA ID #NJD 002165371" RCRA Closure Report
3	7/90 "Specifications for The Removal of Soil at the Inmont Corporation Facility Hawthorne, NJ: Addendum 3 Alterations/Additions to the July 1990 Technical Specifications"
3	7/90 "Specifications for The Removal of Soil at the Inmont Corporation Facility Hawthorne, NJ" prepared for United Technologies Corporation prepared by Fred C. Hart Associates, Inc.
3	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
3	1/10/95 Baker Environmental, Inc. to NJDEP "PCB Sample PTP-7-BS Remediation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" enclosing 3 photos and map
3	1/13/95 Baker Environmental, Inc. to NJDEP "Revised Schedule for PCB Sample PTP-7-BS Remediation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
3	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
3	10/20/89 NJDEP to UTC "Inmont Corporation - Hawthorne Facility Hawthorne Borough, Passaic County, New Jersey ECRA Case #85563 Supplemental Sampling Plan Addendum Dated: August 25, 1989" approved with noted conditions
3	10/23/96 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563 Response to NJDEP Comments Regarding the Remediation of PCB Area Near Building 10' dated January 26, 1996; '4-84 Remedial Action Summary report' dated April 22, 1996 (includes information regarding the discovery of buried drums previously submitted in letters dated December 1, 1995, December 14, 1995 and March 18, 1996."
3	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
3	11/26/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments on Remediation of PCB Area Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached: 1/26/96 Baker Environmental, Inc. to NJDEP "NJDEP Comments on Remediation of PCB Area Near Building 10 Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
3	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
3	12/13/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments to 4-84 Remedial Action Area Summary Report Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
3	12/14/90 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" "As a result of 5/23/90 Cleanup Plan Approval case reassigned to Cleanup Oversight Section.
3	12/14/92 NJDEPE to UTC Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 6/26/92 Soil Remediation Summary Report, 7/9/92 letter, 7/10/92 Addendum A to Soil Remediation Summary Report and 8/14/92 Treatability Study Results Report submitted by Baker Environmental, Inc.
3	12/19/86 General Information Submission BASF Corporation, Chemicals Division Hawthorne Facility submitted to NJDEP ECRA Notice Submission
3	12/29/94 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case # 85563" Comments on letters dated 6/22/94 and 9/16/94

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Request No.	Identification and Description of Responsive Document
3	<p>12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" responding to 11/2/95 and 11/20/95 telephone conversations re 10/25/95 discovery of four buried drums. Spill of 80 gallons of spent acid reported 11/1/95, additional details provided by Baker Environmental, Inc. 11/2/95; attached:</p> <p>12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" reviewed RARs 3/24/95, 4/11/95, 4/17/95 and 4/26/95 and 3/26/95 " 'Comments to Draft NJPDES DGW Permit' and 3/31/95 'Comments to Draft RAW Addendum' "</p>
3	<p>2/25/97 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA #85563" Comments re letters of 11/26/96, 12/13/96 and 11/26/96 Cleanup Plan Progress Report"</p>
3	<p>2/27/95 Baker Environmental, Inc. to NJDEP "Request for Extension to NJDEP Draft RAW Addendum Response United Technologies Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attachment: 1/16/95 Baker Environmental, Inc. to NJDEP "Response to NJDEP Request for Additional Groundwater monitoring United Technologies Corporation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" re groundwater contaminants discovered at Calgon site. attachment: 11/2/94 Baker Environmental, Inc. to NJDEP "Schedule for Remediation of Sample Location PYP-7-BS in PCB Transformer Area United Technologies Corporation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"</p>
3	<p>3/24/95 Baker Environmental, Inc. to NJDEP "Summary of PCB Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attachment summary of analytical data</p>
3	<p>3/8/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 2/15/91 Cleanup Plan Progress Report submitted by McLaren Hart identifying new Area of Concern near former transformer area.</p>
3	<p>3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.</p>
3	<p>4/18/97 "Remedial Action Report Off-Site Sediment and Soil Removal Action" prepared for Merck &amp; Co., Inc. for the former Calgon Corp. Metasol Plant prepared by Rust Environment &amp; Infrastructure</p>
3	<p>4/26/95 Baker Environmental, Inc. to NJDEP April 4, 1995 PCB Transformer Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"</p>
3	<p>5/23/90 NJDEP to UTC "Industrial Establishment Inmont Corporation - Hawthorne Facility ("Inmont") Location: 150 Wagaraw Road, Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Transfer of Stock Cleanup Plan Dated: February 28, 1990 ECRA Case #85563" accepting plan with noted conditions.</p>
3	<p>5/23/94 fax of undated NJDEPE 3 page letter to UTC "Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case Number 85563" completed review of 10/15/93 Final Soils Remediation Report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy letter, 10/15/93 Final Extraction System Studies Report and Progress Reports dated 1/15/94 &amp; 4/15/94. Conditionally approving Inmont Corporation's proposal for no further action for PCB's Tank Farm No. 2, the transformer area, and the former Bldg. No. 5</p>
3	<p>5/23/94 NJDEPE to United Technologies Corporation "Inmont Corporation Hawthorne Boro, Passaic County ISRA Case #85563" providing comments on 10/15/93 Final Soils Remediation report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy, 10/15/93 Final Extraction System Studies Report and Progress Reports of 1/15/94 &amp; 4/15/94.</p>
3	<p>5/23/94 NJDEPE to United Technologies Corporation "Inmont Corporation Hawthorne Boro, Passaic County ISRA Case #85563" providing comments on 10/15/93 Final Soils Remediation report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy, 10/15/93 Final Extraction System Studies Report and Progress Reports of 1/15/94 &amp; 4/15/94.</p>
3	<p>5/23/94 NJDEPE to UTC "Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case Number 85563" [page missing]</p>

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Request No.	Identification and Description of Responsive Document
3	6/19/92 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to "reports up to and including 3/20/92 Post-Excavation Sampling and Analysis Plan submitted by Baker Environmental, Inc."
3	6/5/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 3/15/91 Cleanup Plan Addendum 2 submitted by McLaren Hart "
3	7/13/89 OHM Corporation fax to O'Brien & Gere advising changes needed if > 50 ppm PCBs;; attachment: Generator's Waste Material Profile Sheet OHM H76697
3	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
3	8/28/89 W. Mock " 'D' and 'PCB' Shipping Weights" total trucking weights
3	12/30/88 T. Hays [BASF in-house counsel] to Whilden Parker, Esq., UTC "UTC Hawthorne ECRA Comments" As agreed at meeting with UTC, Fred C. Hart Associates, Inc. and BASF, BASF's comments on draft "ECRA Samplings Plan Results.
3	3/30/94 J. McKeon to J. Poff "Hawthorne Facility – RCRA Status" points to be considered prior to agreement to assume 50% costs re pipe removal & soil removal RCRA Storage Pad
3	4/6/93 NJDEPE to UTC "Inmont Corporation (Inmont) Hawthorne Borough, Passaic County ECRA Case #85563" comments re Baker Environmental, Inc. 1/21/93 correspondence [copy of letter incomplete – only through page 4]
3	5/23/94 J. McKeon to J. Wehman "Hawthorne demolition – Budgetary Estimate" attached 5/1/94 Industrial Construction Environmental to J. McKeon "Hawthorne, NJ Plant Demolition Budgetary Cost Estimate ICE Proposal #04-02229-NYB"
3	6/17/94 Environmental Protection Agency 40 CFR Part 61 "Asbestos NESHAP Clarification of Intent"
3	6/7/91 D. Webster to Hawthorne RCRA File "Chronology of Events Associated with the RCRA, ECRA and PCB Issues"
3	9/26/94 J. McKeon to Steve Murray [NOE/E] "Hawthorne Demolition" current rules for asbestos removal
3a	4/5/91 O'Brien & Gere to D. Webster BASF Corporation Hawthorne, New Jersey Facility – Investigation of RCRA Storage Areas and Transformer Area PCBs presence in transformer area, xylene in UST with marginalia
3c	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
4	8/19/88 O'Brien & Gere to Eric Fox, ECRA Case Mgr. NJDEP Mock "BASF Corporation Inmont Site Hawthorne, NJ ECRA# 87117" providing notification of activities performed by OH Materials to date; highlights and summarizes the individual building status, including storage, transport and disposal of hazardous waste OHM
4	4/68 Interchem Engineering Dept I.C. 697 "Sewer System Plot P[illegible] Exhibit "B" 57 of 57
4	5/11/95 J. McKeon to P. Rubbe "Incident 19512501" attachment: 5/11/95 J. McKeon to NJDEP "Discharge Confirmation" "Types of Hazardous Substances Discharge - Not Hazardous Substance" "Quantity of Substance Discharged – About two ounces fluorescein dissolved in storm and dust control water" and photos
4	1/30/96 R. Awn to W. Pearson "Hawthorne - Environmental Cleanup Costs for Sale" current status: site dismantled to concrete slabs, expect there is additional soil contamination beneath slabs.
4	5/6/95 Draft J. McKeon to P. Rubbe "Incident 19512501" 5-10 foot section of ground of green material that reportedly had come up out of the ground during demolition
4	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
4	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 135: re Vol 2 of 4 GIS by Lan Assoc.; products manufactured
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 136-138: pigments manufactured in Bldg 5
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 138-139: intermediates manufactured in Bldg. 5



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Request No.	Identification and Description of Responsive Document
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 139-141: Styrene acrylate production
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 141-144: re 6/12/85 R. Panicucci, Lan Associates to File – "problems at the site"
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 144-145: re 6/12/85 R. Panicucci, Lan Associates to File –reaction boil over
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 147: Phthalocyanine manufactured at Hawthorne Plant
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 147-149: Spillage
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 149-150: use of solvents
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 150-151: The quinizarine reaction tank rarely boiled over contradicting Exhibit 8
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 151: no recollection of discussions about the burial of sulfuric drums re Exhibit 8
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 152: no recollection of chromium spill re Exhibit 8
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 139: The dyestuffs listed on Table 10-1, page 3 were manufactured in Bldg 5 until the dyestuffs were sold to Sandoz in 1974.
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 145-146: re Exhibit 8 author's characterizations about handling are his own, always a potential for spills; materials emptied manually into reactors
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 52: Toluene used at Hawthorne
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 53: Xylene used as a cleanser
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 56: Lead was brought to the plant as a lead nitrate, not a pure lead. It was a constituent of a red pigment called phloxine. Inmont stopped manufacturing phloxine in the early 1970s because of the lead content.
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 59-63: PCBs were by-products in the manufacture of diarylide yellow and phthalo blue.
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 82 – 83: The plant used water supplied by the Boro of Hawthorne for its processes. In the late fifties and early sixties the Plant used water from the Passaic River for its processes.
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 84-85: solvents
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 86: solvents
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 86-87: solvents
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 36-40: nitrobenzene, added as a solvent to the reactor in Bldg 5
4a	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 21-22: Dyestuffs manufacture ceased in 1974 with sale of intellectual property to Sandoz; manufactured in Bldg 5 & 6
4a	2/5/88 O'Brien & Gere to R. Cuniberti "Hawthorne facility Demolition/Decommissioning Specifications And Procedures"
4a	1/12/89 O'Brien & Gere Log Sheets hand drawn sketches of tanks, notations re tanks, product lines, sewer impact, attachment: 1/20/86 SRS, Inc. invoice

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Request No.	Identification and Description of Responsive Document
4a	1/21/88 O'Brien & Gere to J. Gebrian "Decommissioning/ Demolition Specifications for your review" "Location of the Property Description of the Work BASF Corporation Inmont Site Hawthorne, New Jersey " includes Site Plan with legend that identifies buildings, their use, storage areas, sewer locations
4a	1/21/94 Paul Rubbe [BASF Northeast Team Leader Ecology & Safety] to NJDEPE "BASF Response to Hawthorne 12/7/93 Compliance Evaluation" providing additional information re deficiencies noted in 9/27/93 letter re NJPDES permit..
4a	1/8/90 K. Koneval memo to J. Poff [in-house counsel] "Hawthorne – UTC ECRA" attaching UTC / Fred C. Hart Associates. Inc. letter to NJDEP enclosing 12/13/89 Supplemental Sampling Plan Addendum II for Former Inmont Facility Hawthorne, New Jersey & prepared for UTC
4a	10/13/88 W. Mock to Passaic Valley Sewer Commission [PVSC] "Temporary Storm Sewer Diversion 14404910-31058-0141"
4a	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
4a	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved. 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
4a	12/1/78 A. Kidwell to R. Gasson [Asst. Mgr. Printing Inks] "DCB Handling at Hawthorne"
4a	12/4/89 O'Brien & Gere to K. Koneval "BASF Corporation Hawthorne, New Jersey Facility – Technical Approach" proposal for remedial options, addressing certain areas, such as PCB contaminated soil, former RCRA drum storage pad, storm sewer –fluorescein discharges, etc.
4a	1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, New Jersey Exhibit 'B' 56 of 57" showing "Hazardous Substance / Waste Storage Areas" and legend which indicates each building's use/ manufacturing process, non-point storm sewer discharge point, point storm sewer discharge
4a	3/6/78 E. Heinz[Inmont Corporate Insurance] to R. Gasson [Hawthorne Plant Mgr.] "Liberty Mutual's Loss Prevention Visit – 2/23/78" attaching 2/27/78 Liberty Mutual to E. Heinz: Visit's purpose to evaluate DCB handling procedures.
4a	5/22/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
4a	6/6/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
4a	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attachment: Townley Research and Consulting, Inc. sampling analysis; attachment: O'Brien & Gere log sheet noting PCB Sample locations and readings; attachment: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attachment: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
4a	8/89 O'Brien & Gere "Existing Site Plan BASF Corporation Hawthorne, New Jersey ECRA Decommissioning & Demolition Project" shows building locations, including RCRA Pad, sanitary sewer, storm sewer, manholes, drainage inlets, process & acid sewer [some marginalia]
4a	8/89 O'Brien & Gere "Pre-Demolition Site Plan" showing "Hazardous Substance / Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge [some marginalia]
4a	9/16/88 W. Mock to K. Koneval re "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere"
4a	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
4a	Undated BASF Corporation "Hawthorne Site - Site Locations not Investigated" sanitary sewer, storm sewer, process and acid sewer, manholes, drainage inlet, former transformer pad, USTs marginalia indicating location of former drum storage areas, corrections to Use/Process legend
4a	Undated BASF Corporation "Hawthorne Site Overall Site Plan" showing "Hazardous Substance /Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge, PVSC Flume

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Request No.	Identification and Description of Responsive Document
4a	Undated Lan Associates "United Technologies Corp./Inmont ECRA Hawthorne, New Jersey " "Sanitary & Storm Sewer Location Plan" also showing locations: of buildings, drum storage, manholes, catch basins. Marginalia indicates missing items such as missing storm sewer, additional drum storage, post-it "UST?? Bldg. 27"
4a	Undated Plan of Hawthorne Facility [partial] showing locations of manufacturing processes, drainage ditch, UST, drum storage
4a	2/26/87 & 3/17/87 Discharge Monitoring Reports -no longer taking water from the Passaic River
4a	4/14/72 Bowers memo to Hanzl "Hawthorne –Environmental Control C.E. 402 – Summary of Recent Meeting & Recommended Actions"
4a	7/87 Preliminary ECRA contains manufacturing Process Flow Diagrams for various pigments and narrative
4a	8/3/85 A. Schneid to NJDEP Dept. Water Resources – NPDES Discharge Monitoring Report January to June 1985 ["Passaic River Process & Cool"]
4a	3/16/75 NJDEP Bureau of Air Pollution Control Standby Plans chart lists buildings, products, processes
4a	3/25/86 A. Schneid, Technical Manager letter to F. D'Ascensio includes description of processes, sodium hydroxide used
4a	5/24/91 W. Mock fax to S. Roland, O'Brien & Gere of O'Brien & Gere draft RCRA Closure Summary Report with handwritten revisions
4a	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
4a	5/4/92 W. Mock fax to D. Webster of UTC 4/1/92 cover letter to UTC memo to file "Cortese – On-Site Interview Conducted at BASF Corporation/Inmont Division – 200 Gregg Street, Lodi, New Jersey on 1/15/92"
4a	2/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
4a	3/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
4a	3/30/94 J. McKeon to J. Poff "Hawthorne Facility – RCRA Status" points to be considered prior to agreement to assume 50% costs re pipe removal & soil removal RCRA Storage Pad
4b	3/30/94 rev 3/31/94 J. McKeon memo w/attachment to J. Poff "Hawthorne Facility – RCRA Status"
4b	8/1/85 Schneid to Blanchfield attaching NJDEP 7/30/85 and 7/31/85 Plant Inspection Report – the Plant received minor violations
i, ii, iii	
5	11/25/85 NJDEP to UTC re United Technologies Corporation Inmont Corporation – Hawthorne Facility 150 Wagaraw Road, Hawthorne Boro, Passaic County ECRA Case #85563" re sampling Plan, recent spill
5	Undated "United Technologies Corporation ECRA Hawthorne Facility Sanitary & Storm Sewer Location" Site Operations Plan Figure 151 prepared by Lan Associates
5	5/29/92 "Site History Former Inmont Facility 150 Wagaraw Road. Hawthorne, New Jersey" for United Technologies corporation by Baker Environmental, Inc.
5	3/17/92 D. Webster to NJDEPE "Your letter dated January 14, 1992 on Closure Certification for BASF's Hawthorne facility, EPA ID #NJD 002165371, NJ Project No. CP—86-27" acknowledging receipt of 1/14/92 acceptance of closure certifications. Advising that BASF completed ECRA obligations, Negative Declaration received 5/31/90.
5	3/27/92 NJDEPE to D. Webster "Hazardous Waste Container and Tank Storage Area Remediation, BASF Hawthorne Facility, Hawthorne, NJ, EPA ID #NJD 002165371, NJ Project No. CP-86-27"
5	10/11/00 A. Gaggis Deposition testimony in re UTC v. American Home Assurance at pages 159-161: re Exhibit 11 7/10/85 Gus doesn't recall seeing the document previously, and does not understand the reference to the statement "past bad reactions were dumped." Nor does he recall discussions relating to the bullet point, "Paul Mock, Gus Gaggis report truckload of leaking drums buried before 1976."
5	10/11/00 A. Gaggis Deposition testimony in re UTC v. American Home Assurance at page 50: Wastes were disposed of "by the proper means....Some were discarded by a private waste hauler, and others were carted out by approved waste haulers of solvents...."
5	10/11/00 A. Gaggis Deposition testimony in re UTC v. American Home Assurance at pages 36-40: nitrobenzene, added as a solvent to the reactor in Bldg 5

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
5	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
5	9/25/89 W. Mock to K. Koneval "RCRA Status Inspection Same day inspection by NJDEP no hazardous waste on site"
5	10/85 Spill Control Plans A revised 10/85 Spill Contingency Plan contains a diagram of the plant designating areas where drums were stored.
5	1974 Spill Control Plan
5	4/19/83 Environmental Survey of Hawthorne Plant II
5	4/19/83 Environmental Survey of Hawthorne Plant II
5	11/16/89 W. Mock handwritten "PCB Dirt" Shipping date, CWMA Manifest #; Amounts, Dest. Emelle, AL
5	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
5	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5	4/81 Inmont Corporation Standards for Generator/Treater/Storer of Hazardous Wastes Hawthorne Plant
5	4/81 Inmont Corporation Standards for Generator/Treater/Storer of Hazardous Wastes Hawthorne Plant
5	5/1/78 NJ Manifest System for Controlling Hazardous Wastes with attached list of plant personnel and related responsibilities
5	Hazardous Waste Facility Standards Form Revision II 9/6/84 WCH
5	1/15/99 NJDEP to UTC "response to the NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) dated October 29, 1998" including Inmont requests for no further action former process sewer lines, and AECs for which further action required per 8/18/98 letter
5	10/29/98 Brian Diepeveen to NJDEP "Response to NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) – Former Inmont Facility Hawthorne, Passaic County: ISRA Case No. 85563" responding on behalf of UTC
5	2/23/99 Brian Diepeveen to NJDEP " 'Registrations Removed' of Underground Storage Tanks BASF Corporation, Hawthorne, New Jersey Facility" USTs removed from site in 1997, were unregistered and were "removed from service sometime prior to 1973."
5	9/8/97 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" response to 5/12/96 Cleanup Plan Progress Report, telephone conversation of NJDEP & Baker Environmental, Inc. on 5/12/97, 8/18/97 and 9/3/97 Site visit.
5	Undated BASF Site Plan "Hawthorne Site Areas of Environmental Concern Figure 1"
5	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Closure Summary EPA ID #NJD 002165371" RCRA Closure Report
5	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
5	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
5	10/20/89 NJDEP to UTC "Inmont Corporation - Hawthorne Facility Hawthorne Borough, Passaic County, New Jersey ECRA Case #85563 Supplemental Sampling Plan Addendum Dated: August 25, 1989" approved with noted conditions
5	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
5	12/14/90 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" "As a result of 5/23/90 Cleanup Plan Approval case reassigned to Cleanup Oversight Section.
5	12/14/92 NJDEPE to UTC re Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 6/26/92 Soil Remediation Summary Report, 7/9/92 letter, 7/10/92 Addendum A to Soil Remediation Summary Report and 8/14/92 Treatability Study Results Report submitted by Baker Environmental, Inc.

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
5	12/29/94 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case # 85563" Comments on letters dated 6/22/94 and 9/16/94
5	12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" responding to 11/2/95 and 11/20/95 telephone conversations re 10/25/95 discovery of four buried drums. Spill of 80 gallons of spent acid reported 11/1/95, additional details provided by Baker Environmental, Inc. 11/2/95; attachment: 12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" reviewed RARs 3/24/95, 4/11/95, 4/17/95 and 4/26/95 and 3/26/95 " 'Comments to Draft NJPDES DGW Permit' and 3/31/95 'Comments to Draft RAW Addendum' "
5	3/8/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 2/15/91 Cleanup Plan Progress Report submitted by McLaren Hart identifying new Area of Concern near former transformer area.
5	4/4/94 B. Diepeveen to UTC "Hawthorne RCRA/ECRA Issues" per 3/29/94 meeting BASF requesting "UTC address any actual or potential soil and/ or groundwater contamination related to the former RCRA UST as part of its ECRA program." Enclosing NJDEPE correspondence re same, 8/93 NJDEPE to D. Webster "Request for Permit Termination – DGW Closure/Post-Closure Section of NJPDES DSW/DGW Permit NJ0002453 BASF Corporation - Hawthorne Site; Passaic County, New Jersey"
5	5/23/90 NJDEP to UTC "Industrial Establishment Inmont Corporation - Hawthorne Facility ("Inmont") Location: 150 Wagaraw Road, Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Transfer of Stock Cleanup Plan Dated: February 28, 1990 ECRA Case #85563" accepting plan with noted conditions.
5	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
5	8/19/86 D. Webster to NJDEP providing notification of intent to close UST
5a	10/11/00 A. Gaggis Deposition testimony in re UTC v. American Home Assurance at page 49: Gus oversaw waste disposal activities from 1979-1986
5a	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
5a	1/13/89 Hawthorne Decommissioning Progress Report #13: 12/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	1/18/89 T. Szelest, BASF Environmental Specialist to O'Brien & Gere with action list of items re truckload of material returned to Hawthorne plant.
5a	1/20/89 Hawthorne Decommissioning Progress Report #14: 1/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	10/10/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; contractor has responsibility to arrange for sampling and analysis
5a	10/13/88 Handwritten List "Concrete Recycling" from KCK [Discussion with ? Ken Koneval
5a	10/19/88 O'Brien & Gere responding to OHM 9/29/88 letter re Analytical Report for acid brick and determination to classify bricks as hazardous
5a	10/21/88 Hawthorne Decommissioning Progress Report #8: 10/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	10/24/88 O'Brien & Gere to OHM requesting cost estimate for removal and disposal of tank adjacent to Bldg. 12 per attached Scope of Work
5a	10/5/88 Hawthorne Decommissioning Progress Report #7: 9/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	11/29/88 Chemical Waste Management to BASF, Hawthorne, NJ agreeing to accept waste as characterized on Generators Waste Profile Sheet(s) OHM H76513.
5a	11/29/88 Hawthorne Decommissioning Progress Report #10: 11/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	11/7/88 Hawthorne Decommissioning Progress Report #9: 10/16-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
5a	11/7/88 W. Mock to Chemical Waste Management verifying his authorization to test acid solids materials on Waste Profile Sheet H76494, which is attached.
5a	12/13/88 Hawthorne Decommissioning Progress Report #11: 11/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	2/10/89 Hawthorne Decommissioning Progress Report #15: 1/15-31/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	2/23/89 Hawthorne Decommissioning Progress Report #16: 2/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	2/24/89 W. Mock letter to ENSCO, Inc. advising that contract should be made out between OHM and ENSCO. OHM is handling all waste shipments from Hawthorne
5a	3/22/89 Hawthorne Decommissioning Progress Report #17: 2/15-28/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	4/4/89 Hawthorne Decommissioning Progress Final Report #18: 3/1-17/89 status report, highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	6/21/88 K. Koneval memo to R. Doerfler, BASF Purchasing "Freon Disposition" attachment: W. Mock 6/10/88 memo to K. Koneval "Freon Disposition (R-22-Monochlorodifluoromethane)" and MSDS; attachment: undated "Listed Facilities in Northeastern States" schematic with names of waste disposal services and locations; attachment: 7/25/88 C.E. Nuti handwritten response to K. Koneval re 6/21/88 W. Mock memo - DOT shipping specifications and codes re (R-22-Monochlorodifluoromethane)" attachment: 11/22/88 Straight Bill of Lading; attachment: 10/6/88 Rollins Environmental Services (J) Inc fax Waste Data Sheet signed by K. Koneval
5a	7/17/87 W. Mock to O'Brien & Gere enclosing RCRA Closure Plan; attachment: 7/13/87 D. Webster fax to J. Gebrian of 7/8/87 NJDEP review of Closure Plan; attachment: 9/3/86 handwritten Sign In Sheet for Hawthorne RCRA Closure Meeting with BASF Inmont and NJDEP personnel; attachment: 8/19/86 D. Webster letter to NJDEP outlining reasons that BASF believes groundwater monitoring for the underground hazardous waste storage tank is not warranted; attachment: 8/11/86 D. Webster to NJDEP enclosing the Alternative Information Statement re notification for changing the facility's name, Closure Plan including provisions for the underground hazardous waste storage tank and drum storage area.]
5a	7/20/88 Hawthorne Decommissioning Progress Report #2: 7/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	7/8/88 Hawthorne Decommissioning Progress Report #1: 6/13-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM
5a	8/16/88 O'Brien & Gere memo to File "BASF Inmont Job Coordination Meeting" modifications: OHM to accept responsibility for disposal of building rubble at landfill; BASF decided that trays outside Bldg. 6A to be disposed of as hazardous waste; all PCBs to be removed from plant within 7 days to appropriate site
5a	8/25/88 Hawthorne Decommissioning Progress Report #4: 8/1-15/88 highlights and individual bldg. status, including storage, transport and disposal of hazardous waste
5a	8/3/88 Hawthorne Decommissioning Progress Report #3: 7/16-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM;
5a	9/16/88 Hawthorne Decommissioning Progress Report #5: 8/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	9/20/88 Hawthorne Decommissioning Progress Report #6: 9/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5a	9/30/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; residual product to be removed prior to demolition; concrete pits contain residual product; contractor has responsibility to arrange for sampling and analysis
5a	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
5a	10/25/88 OHM to Solvent Recovery Service of NJ enclosing SRS Hazardous Waste Data Sheet of liquid wastes stream for BASF Corp.
5a	10/26/88 OHM to SCA Chemical Services, Inc. enclosing Waste Management, Inc. Generator's Waste Material Profile Sheet for BASF Corp.

**Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests**  
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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
5a	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
5a	7/18/86 A. Schneid to Canonie Engineers enclosing trucking slips re removal of liquid wastes to Marisol (Nappi Trucking-hauler) and waste flammable to Delaware Container (Zydinsky Environmental-hauler)
5a	4/1/89 W. Mock memo w/enclosures to D. Webster "High Point Sanitary Landfill – Ref: Letter Hays/ Distribution 3/21/89" Hawthorne employee information; types of waste and waste services; attachment: Hazardous Waste Generator Annual Reports 1982 to 1987
5a	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5a	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5a	5/1/78 NJ Manifest System for Controlling Hazardous Wastes with attached list of plant personnel and related responsibilities
5b	10/89 ECRA Decommissioning and Demolition Report the waste haulers for the decommissioning process are listed
5b	1/12/89 O'Brien & Gere Log Sheets hand drawn sketches of tanks, notations re tanks, product lines, sewer impact; attachment: 1/20/86 SRS, Inc. invoice
5b	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility ECRA Case No. 87117" responding to 11/30/89 NJDEP letter (attached)
5b	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste generator/Transporter information
5b	5/10/84 memo "Drum Disposal" Paul Mock and Tom Czajkowski visited Hackensack Meadowlands Development Commission in response to call about abandoned and contaminated drums. Decontaminated drums dumped by New Jersey Carting, paperwork, etc in "accord with Inmont disposal procedures." Recommendation to label drums accordingly.
5b	10/89 O'Brien & Gere "ECRA Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ BASF Corporation October 1989"
5b	6/94 Baker Environmental, Inc. "Attachment Volume 1 of 1 Attachments to June 22, 1994 Response to NJDEPE Letter dated May 23, 1994 United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
5b	1/13/89 Hawthorne Decommissioning Progress Report #13: 12/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	1/18/89 T. Szelest, BASF Environmental Specialist to O'Brien & Gere with action list of items re truckload of material returned to Hawthorne plant.
5b	1/20/89 Hawthorne Decommissioning Progress Report #14: 1/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	1/8/92 D. Webster to Troy Charlton (UTC) enclosing documentation, including manifests from O'Brien & Gere Hazardous Waste Manifest CWMA 442933 and Generator's Waste Material Profile Sheet OHM H 76697
5b	10/10/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; contractor has responsibility to arrange for sampling and analysis
5b	10/21/88 C. R. Evans memo to U. Soenksen "Hawthorne decommissioning Status Update"
5b	10/21/88 Hawthorne Decommissioning Progress Report #8: 10/1-15/88 highlights and individual bldg. status, including storage, transport and disposal of hazardous waste
5b	10/24/88: O'Brien & Gere to OHM requesting cost estimate for removal and disposal of tank adjacent to Bldg. 12 per attached Scope of Work
5b	10/5/88 Hawthorne Decommissioning Progress Report #7: 9/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	11/29/88: Hawthorne Decommissioning Progress Report #10: 11/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	11/7/88 Hawthorne Decommissioning Progress Report #9: 10/16-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	12/13/88 Hawthorne Decommissioning Progress Report #11: 11/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	12/16/91 fax to D. Webster from W. Mock Hazardous Waste Manifest CWMA 442933

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
5b	2/10/89 Hawthorne Decommissioning Progress Report #15: 1/15-31/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	2/23/89 Hawthorne Decommissioning Progress Report #16: 2/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	3/22/89 Hawthorne Decommissioning Progress Report #17: 2/15-28/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	4/4/89 Hawthorne Decommissioning Progress Final Report #18: 3/1-17/89 status report, highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	6/21/88 K. Koneval memo to R. Doerfler, BASF Purchasing "Freon Disposition" attached: W. Mock 6/10/88 memo to K. Koneval "Freon Disposition (R-22-Monochlorodifluoromethane)" and MSDS; attached: undated "Listed Facilities in Northeastern States" schematic with names of waste disposal services and locations; attached: 7/25/88 C.E. Nuti handwritten response to K. Koneval re 6/21/88 W.Mock memo - DOT shipping specifications and codes re (R-22-Monochlorodifluoromethane)" attached: 11/22/88 Straight Bill of Lading; attached: 10/6/88 Rollins Environmental Services (J) Inc fax Waste Data Sheet signed by K. Koneval
5b	7/20/88 Hawthorne Decommissioning Progress Report #2: 7/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	7/21/88 OHM to W. Mock "Six Electrical Transformers Containing PCB Oil" - dismantling, handling and disposal related procedures
5b	7/8/88 Hawthorne Decommissioning Progress Report #1 6/13-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM
5b	8/25/88 Hawthorne Decommissioning Progress Report #4: 8/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	8/3/88 Hawthorne Decommissioning Progress Report #3: 7/16-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM;
5b	9/16/88 Hawthorne Decommissioning Progress Report #5: 8/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	9/20/88 Hawthorne Decommissioning Progress Report #6: 9/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5b	9/30/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; residual product to be removed prior to demolition; concrete pits contain residual product; contractor has responsibility to arrange for sampling and analysis
5b	1/3/89 Hazardous Waste Manifest CWMA 448832; attachment: 10/6/88 handwritten request W. Mock to OHM to retype Manifest OHM H 76467 with suggested revisions; OHM 10/4/88 to W. Mock encloses OHM H 76513, which incorporates, suggested revisions.
5b	10/25/88 OHM to Solvent Recovery Service of NJ enclosing SRS Hazardous Waste Data Sheet of liquid wastes stream from BASF Corp.
5b	10/26/88 OHM to SCA Chemical Services, Inc. enclosing Waste Management, Inc. Generator's Waste Material Profile Sheet for BASF Corp.
5b	1988 Uniform Hazardous Waste Manifest NJA 0537766; attachment: 12/88 Solvent Recovery Service Notification of Shipment of a Hazardous Waste Restricted from Land Disposal
5b	1989 Invoices dated 8/8/89, 8/9/89 8/11/89, 11/22/89, 9/21/89 8/31/89 9/18/89 from CWM Chemical Services re disposal of Passaic River sediment
5b	7/18/86 A. Schneid to Canonie Engineers enclosing trucking slips re removal of liquid wastes to Marisol (Nappi Trucking-hauler) and waste flammable to Delaware Container (Zydinsky Environmental-hauler)
5b	1981 through 1986 NJDEP Hazardous Waste Generator Annual reports
5b	1986 Hazardous Waste Generator Annual Report forwarded to NJDEP 2/27/87
5b	1986 TSDF Annual Report forwarded to NJDEP 2/27/87
5b	4/1/89 W. Mock memo w/enclosures to D. Webster "High Point Sanitary Landfill – Ref: Letter Hays/Distribution 3/21/89" Hawthorne employee information; types of waste and waste services; attachment: Hazardous Waste Generator Annual Reports 1982 to 1987



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Request No.	Identification and Description of Responsive Document
5b	4/23/81 D. Kuta memo "W Operating Records" with attached information specific to Hawthorne Plant, including hazardous and non-hazardous disposal sites and services
5c	10/12/87 J. Gebrian memo to K. Hansen re "Status of Environmental Situation at Hawthorne"
5c	6/13/89 K. Koneval to City of Paterson, Division of Health re "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal"
5c	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 53: Drums were stored throughout the plant close to the operations where the contents were used
5c	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 76: The waste solvent storage tank mentioned in the 1/29/82 W. Mock interoffice memo to Gaggis (Exh. 2) was located near Building 4.
5c	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 77-78: The first underground tank farm was located by Bldg 5, another underground tank farm was located by Building 4
5c	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
5c	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Sampling Results EPA ID# NJD002165371" sampling procedures, Accutest Laboratories
5c	2/5/88 O'Brien & Gere to R. Cuniberti "Hawthorne facility Demolition/Decommissioning Specifications And Procedures"
5c	3/88 Three photos depicting RCRA Storage Tank "proposed well locations and former Tank Farm #2 with O'Brien & Gere "Photo Location Plan" and Photo Log
5c	5/7/86 NJDEP to A. Schneid "Unauthorized Ownership Change and Hazardous Waste Tank Closure, BASF Corporation (formerly Inmont Corporation), Chemicals Division, Hawthorne, Passaic County, EPA ID# NJD002165371" requesting closure plan be submitted
5c	7/31/91 O'Brien & Gere Submission to NJDEP "BASF Corporation Hawthorne, NJ Facility EPA ID# NJD002165371" documenting RCRA closure in response to NJDEP 6/4/91
5c	8/1/86 "Hawthorne closure Plan Summary Sheet – August 1, 1986 150 Wagaraw Road Hawthorne, NJ EPA ID# NJD002165371" "temporary stores hazardous waste in one 3,000 gallon underground tank and a maximum of 60 – 55 gallon drums."
5c	9/18/87 NJDEP notice to BASF Corporation that initial payment was underpaid; waiting for: "RCRA Closure Plan for 3000 gal. xylene waste tank;" "Excavation of Tank Farm #2" "names of hazardous waste transporters"
5c	9/2/88 O'Brien & Gere to K. Koneval enclosing report "Analytical results from the RCRA Drum Storage Pad" performed by Accutest Laboratories
5c	9/28/87 J. Gebrian to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Waste Storage Area and Underground Tank"
5c	Undated D. Webster to Phil [Phil Webb] excerpt from O'Brien & Gere report chart "PCB Analytical Summary" explanation for the 56 ppm reading in soil near RCRA pad
5c	1/14/91 D. Webster to UTC confirming decisions arrived at during a "recent meeting" including responsibilities for: tank removal, PCB impacted soil, storm drainage ditch, etc.
5c	1/14/92 NJDEP to D. Webster "S01/S02 Closure Certification for the BASF Corporation, Wagaraw Rd., Hawthorne, Passaic Co., NJ, EPA ID #NJD 002165371, NJ Project No. CP-86/27" responding to BASF 7/31/91 and 10/31/91 submittals and 4/25/88 closure plan approval letter, and accepting the closure certification.
5c	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
5c	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
5c	1/21/88 O'Brien & Gere to J. Gebrian "Decommissioning/ Demolition Specifications for your review" "Location of the Property Description of the Work BASF Corporation Inmont Site Hawthorne, New Jersey " includes Site Plan with legend that identifies buildings, their use, storage areas, sewer locations



Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
5c	1/27/89 O'Brien & Gere fax to K. Koneval partial schematic showing locations of former solvent tanks in vicinity of RCRA storage tank.
5c	1/28/89 W. Mock fax to K. Koneval materials sent via registered mail from Gus Gaggis to USEPA Region II including schematics of Hawthorne Boro, schematic drum storage and UST, 1980 Hazardous Waste Permit Application
5c	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
5c	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved. 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
5c	11/11/91 and 11/6/91 drafts D. Webster to Troy Charlton, UTC "Hawthorne RCRA/ECRA Issues"
5c	12/17/91 D. Webster to NJDEP "Hawthorne Manifest" enclosing requested Hazardous Waste Manifest CWMA 442933 documenting that RCRA tank was cut up and sent offsite.
5c	1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, New Jersey Exhibit 'B' 56 of 57" showing "Hazardous Substance/Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge
5c	1997 Photo Log of water lines cut and capped by contractor; storm sewer connections capped; UST #2 "pulled and destroyed" attachment: 1996 "Hawthorne Site – Site Demolition Plan & Contractor Laydown Area"
5c	3/7/89 K. Koneval to UTC: as requested by Hart Associates enclosing RCRA closure documents – 9/28/87 Amendment #1 – Closure Plan for Hazardous Waste Storage Area and UST submittal to NJDEP; 11/9/87 Amended Closure Plan submittal to NJDEP; and 4/25/88 Revised Closure Plan Approval issued by NJDEP
5c	4/18/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – Sampling Program" cost estimate for sampling at former transformer, RCRA storage tank and pad areas
5c	4/19/88 NJDEP Internal memo "Closure of One Hazardous Waste Drum Storage Pad and One Hazardous Underground Storage Tank at BASF Corp. – Inmont, Hawthorne, EPA ID #NJD 002165371" Draft approval mentioned in memo is not attached as stated
5c	4/23/90 NJDEP to K. Koneval "Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371"
5c	4/7/88 O'Brien & Gere to NJDEP "BASF RCRA Storage Tank Monitoring Wells, Hawthorne, New Jersey Facility"
5c	4/8/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation - Inmont, Hawthorne EPA ID# NJD002165371" re hazardous waste storage area and the 3,000 gallon UST
5c	5/19/88 O'Brien & Gere to W. Mock "RCRA Closure" providing sampling, analytical and documentation services required for closure of RCRA UST and storage, including correspondence to/from NJDEP; 4/25/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation- Inmont Hawthorne EPA ID #NJD 002165371"; 4/6/88 O'Brien & Gere to NJDEP "BASF RCRA Storage Tank Monitoring Wells, Hawthorne, New Jersey Facility"; 9/28/87 J. Gebrian to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Waste Storage Area and Underground Tank BASF Corporation – Inmont Site, Hawthorne, New Jersey"; 7/13/87 D. Webster to J. Gebrian Reply Message attaching 7/8/87 NJDEP to D. Webster "Closure Plan for Hazardous Waste Storage Area and Underground Tank for BASF Corp. – Inmont, Hawthorne, EPA ID #NJD 002165371 "
5c	5/19/89 K. Koneval Draft to NJDEP "BASF Corporation - Inmont Site Hawthorne, New Jersey RCRA Underground Storage Tank"
5c	5/22/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
5c	5/30/91 D. Webster to NJDEP "Hawthorne BASF RCRA Closure" fax of BASF 6/23/90 response to DEP's request for a plan to delineate and remediate RCRA units.
5c	5/6/86 A. Schneid to NJDEP "Registration of Underground [Underground] Tank Currently Being Removed" attachment: Completed NJDEP Form "Underground Storage Tank Registration Questionnaire"

**Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
5c	6/13/89 K. Koneval to NJDEP "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal" enclosing Standard Reporting Form and Site Assessment Compliance Statement
5c	6/16/92 Baker Environmental, Inc. to Troy Charlton, [UTC] "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
5c	6/16/92 Baker Environmental, Inc. to Troy Charlton, [UTC] "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
5c	6/23/90 K. Koneval to NJDEP "Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371" responding to 4/23/90 letter.
5c	6/26/91 D. Webster to NJDEP "Permit Termination Request; NJPDES Permit No. NJ0002453"
5c	6/6/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
5c	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attachment: Townley Research and Consulting, Inc. sampling analysis; attachment: O'Brien & Gere log sheet noting PCB Sample locations and readings; attachment: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attachment: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
5c	7/24/90 Fred C. Hart Associates, Inc. letter to R. Trinks "ECRA Soil Remediation at the Former Inmont Corporation Hawthorne Facility"
5c	7/24/90 R. Trinks to A. Gillen "Ecology Issues at Hawthorne" memo with handwritten revisions
5c	7/25/90 R. Trinks memo to J. Poff, D. Webster "Ecology Issues at Hawthorne" Hart Clean-up Plan doesn't address "area south of Building 10. PCBs have been found outside the fence..."
5c	7/3/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – RCRA Program" UST removed and transported off-site for disposal. Drum storage pad requires additional cleaning – Inland Pollution Services, Inc. retained
5c	7/31/91 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility - EPA ID #NJD 002165371" In response to NJDEP's 3/28/91 letter re Closure Plan Certification S01 – Hazardous Waste Container Storage Area
5c	7/5/89 NJDEP to Lowenstein Sandler "DGW Closure/Post Closure Section of NJPDES Permit No. NJ0002453 BASF Corporation – Chemicals Division; Hawthorne, Passaic County"
5c	7/7/93 J. Wehman to D. Webster e-mail "Hawthorne Site" removal of UST, hazardous waste storage pad contamination re need to determine BASF RCRA responsibilities
5c	7/8/87 NJDEP to D. Webster "Closure Plan for Hazardous Waste Storage Area and Underground Tank for BASF Corporation - Inmont, Hawthorne, EPA ID# NJD002165371
5c	8/5/91 D. Webster to NJDEP attaching Owner/ Operator Certification re " closure of hazardous waste facility's apparatus, secondary containment, tanks and associated apparatus..."
5c	8/8/91 D. Webster to NJDEP "Follow-up to Meeting of July 31, 1991" enclosing copy of 6/1/89 Closure Summary Report for the RCRA Units at BASF's Hawthorne Facility. [not attached as indicated].
5c	8/89 O'Brien & Gere "Existing Site Plan BASF Corporation Hawthorne, New Jersey ECRA Decommissioning & Demolition Project" shows building locations, including RCRA Pad, sanitary sewer, storm sewer, manholes, drainage inlets, process & acid sewer [some marginalia]
5c	8/89 O'Brien & Gere "Pre-Demolition Site Plan" showing "Hazardous Substance/Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge [some marginalia]
5c	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
5c	9/28/87 BASF Corporation to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Storage Area and Underground Tank BASF Corporation - Inmont Site, Hawthorne, New Jersey (EPA ID# NJD00216537"
5c	Undated Handwritten Notes re RCRA/ECRA Issues between BASF & UTC options, positions, attempt to determines responsibilities and rough calculations for cost estimates for individual tasks for tank area, "PCB pad" drum storage pad - list of observations when UST removed intact – solvent odors, staining below tank, contaminants detected under tank – toluene, TPH

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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5c	Undated BASF Corporation "Hawthorne Site - Site Locations not Investigated" sanitary sewer, storm sewer, process and acid sewer, manholes, drainage inlet, former transformer pad, USTs marginalia indicating location of former drum storage areas, corrections to Use/Process legend
5c	Undated BASF Corporation "Hawthorne Site Overall Site Plan" showing "Hazardous Substance/Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge, PVSC Flume
5c	Undated BASF Corporation "Hawthorne Site UTC's Areas of Environmental Concern" [colorized map] Pump house access road, "oily substance area," storm sewer discharge location of former transformers, tanks, tank farms
5c	Undated hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Building 10; Storage Pad "; attachment: 6/22/89 Envirotech Research, Inc report.
5c	Undated Lan Associates "United Technologies Corp./Inmont ECRA Hawthorne, New Jersey " "Sanitary & Storm Sewer Location Plan" also showing locations: of buildings, drum storage, manholes, catch basins. Marginalia indicates missing items such as missing storm sewer, additional drum storage, post-it "UST?? Bldg. 27"
5c	Undated Plan of Hawthorne Facility [partial] showing locations of manufacturing processes, drainage ditch, UST, drum storage
5c	Undated Schematic of "UST Area" showing locations of Tank Farm #2, concrete slab [ RCRA storage pad?], soil sample locations
5c	1/18/85 Canonie Engineers Proposal UST Decommissioning and Waste Characterization [includes lab results on samples submitted
5c	12/21/84 R. Trinks memo to Gus Gaggis advising that Hawthorne has missed Inmont compliance date for testing USTs
5c	4/14/72 Bowers memo to Hanzl "Hawthorne –Environmental Control C.E. 402 – Summary of Recent Meeting & Recommended Actions"
5c	4/15/85 R. Trinks memo to W. W. Mock state requirement to have monitoring wells up- and down-gradient of any hazardous waste tanks.
5c	4/9/85 R. Trinks memo to W. W. Mock attaching NJ regulations re USTs and hazardous wastes
5c	7/1/85 Blanchfield memo to A. Gaggis and W. Mock 7/9/85 response requesting design criteria to eliminate USTs and replace with above ground storage tanks
5c	3/16/75 NJDEP Bureau of Air Pollution Control Standby Plans chart lists buildings, products, processes
5c	4/86 During ECRA Site Inspections it was noted that drums were stored on a "Concrete slab representing floor of Building #5..."
5c	7/27/83 Memo re Curbing Requirements for Empty Drum Storage Pads
5c	10/30/90 D. Webster to NJDEP enclosing 6/23/90 letter to NJDEP – Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371
5c	2/28/90 Cleanup Plan for Inmont Corporation Facility Hawthorne, New Jersey prepared for United Technologies Corporation
5c	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
5c	1/13/89 Hawthorne Decommissioning Progress Report #13: 12/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	1/20/89: Hawthorne Decommissioning Progress Report #14: 1/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	1/5/88 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen "NJDEP Permit" attachment: 12/24/87 NJDEP TO J. Gebrian "Response of comments and Issuance of Final Major Modification of NJPDES DSW Permit NJ0002453" re closure of an underground hazardous waste storage tank.
5c	10/21/88 C. R. Evans memo to U. Soenksen "Hawthorne decommissioning Status Update"
5c	10/21/88 Hawthorne Decommissioning Progress Report #8: 10/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	10/24/88 O'Brien & Gere to OHM requesting cost estimate for removal and disposal of tank adjacent to Bldg. 12 per attached Scope of Work

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Request No.	Identification and Description of Responsive Document
5c	10/28/91 D. Webster to U. Soenksen "Hawthorne RCRA Negotiations" locations where hazardous wastes were stored on site
5c	10/5/88 Hawthorne Decommissioning Progress Report #7: 9/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	11/29/88 Hawthorne Decommissioning Progress Report #10: 11/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	11/7/88 Hawthorne Decommissioning Progress Report #9: 10/16-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	12/13/88 Hawthorne Decommissioning Progress Report #11: 11/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	12/21/93 J. McKeon fax to W. Mock "Site Map Showing Historical Areas of Environmental Concern UTC/Inmont Hawthorne, NJ"
5c	1988 NJPDES Final Permit Modification" requesting notification if recipients plan to attend meeting; 4/4/88 Meeting Attendance Sheet 2/4/88 W. Mock handwritten meeting notations; 1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, NJ RCRA Storage Tank Background Information Outline" lists documents and Plans,
5c	1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, NJ RCRA Storage Tank Background Information Outline"
5c	2/10/89 Hawthorne Decommissioning Progress Report #15: 1/15-31/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	2/22/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" materials approved for disposal, or disposed of at various facilities
5c	2/22/89 W. Mock Notes on "Job Meeting Agenda" "ThermalKEM PCB soils; ENSCO"
5c	2/23/89 Hawthorne Decommissioning Progress Report #16: 2/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	3/22/89 Hawthorne Decommissioning Progress Report #17: 2/15-28/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	3/8/88 BASF Corp PO retaining O'Brien & Gere for additional services re RCRA Closure - 3000 gal. underground hazardous waste storage tank as outlined in attached O'Brien & Gere 2/14/88 proposal
5c	4/15/85 R. Trinks memo to W. W. Mock state requirement to have monitoring wells up- and down-gradient of any hazardous waste tanks.
5c	4/25/88 NJDEP Response re "Revised Closure Plan Approval, BASF Corporation – Inmont Hawthorne, EPA ID No. NJD 002 165 371"; with handwritten notations (W. Mock?)
5c	4/4/89 Hawthorne Decommissioning Progress Final Report #18: 3/1-17/89 status report, highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	4/9/85 R. Trinks memo to W. Mock "Underground Hazardous Waste Tanks"
5c	5/24/91 W. Mock fax to S. Roland, O'Brien & Gere of O'Brien & Gere draft RCRA Closure Summary Report with handwritten revisions
5c	5/4/89 O'Brien & Gere letter to OHM disposal dates will exceed permitted 90-day. Contact to request extension provided.
5c	6/16/92 Baker Environmental, Inc. to Troy Charlton, [UTC] "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
5c	6/20/85 R. Trinks handwritten Reply Message to W. Mock re Underground Waste Storage Tank
5c	6/3/91 O'Brien & Gere to W. Mock enclosing 6/1/89 submission to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Closure Summary Report EPA ID #NJD002165371
5c	7/20/88 Hawthorne Decommissioning Progress Report #2: 7/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	7/23/85 R. Blanchfield memo to A. Schneid "Above Ground Tank Standard" forwarding copy of R. Trinks 5/9/85 memo to R. Currie "Bound Brook Bulk Storage"
5c	7/8/88 Hawthorne Decommissioning Progress Report #1: 6/13-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM
5c	8/25/88 Hawthorne Decommissioning Progress Report #4: 8/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste

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Request No.	Identification and Description of Responsive Document
5c	8/3/88 Hawthorne Decommissioning Progress Report #3: 7/16-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste OHM;
5c	8/9/88 C. R. Evans, BASF Holland, MI to U. Soenksen "Hawthorne Decommissioning Status Update" five roll-off boxes of hazardous waste accumulated, proper disposition to be determined
5c	9/16/88 Hawthorne Decommissioning Progress Report #5: 8/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	9/16/88 W. Mock to K. Koneval "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere" attachment: 10/26/88 O'Brien & Gere Analytical Summary former hazardous waste storage tank, and hazardous waste storage pad)
5c	9/20/88 Hawthorne Decommissioning Progress Report #6: 9/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
5c	9/4/87 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen, O'Brien & Gere re "Hawthorne " enclosing draft permit for DGW re closure of hazardous waste tank.
5c	9/88 Agenda [for BASF Inmont Job Coordination Meeting] Bldg. 31 freon and T&D for RCRA Tank/Former Hazardous Waste Storage Tank Soil
5c	9/9/88 C. R. Evans, BASF Holland, MI to U. Soenksen "Hawthorne Decommissioning Status Update" Pilot Plant
5c	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
5c	2/22/86 Canonie Engineers to W. Mock "Proposal Partial Tank Farm Decommissioning API Ink Division Hawthorne, New Jersey"
5c	9/24/75 Plot Plan Hawthorne Inmont Corporate Engineering Dept. buildings, storm drains, manholes, catch basins depicted in addition to locations of tanks with legend to list contents
5c	11/19/86 R. Trinks responding to 10/24/86 USEPA Region II questions re possible violation of Oil Pollution Prevention Regulation storage tanks above- and below-ground
5c	12/15/80 Hazardous Waste Compliance Checklist [source unknown] forwarded by D. Kuta 1/19/81
5c	1987 EPA National Survey of Hazardous Waste Generators Instructions; 1988 & 1989 EPA Survey Responses for Hawthorne Plant
5c	3/13/81 P. Mock memo to J. P. Italiano "Spill Plans" reason Hawthorne does not fit classification as "Major Facility,"
5c	3/31/81 D. Kuta memo re "RCRA Compliance Workshop"
5c	3/9/81 D. Kuta memo "Hazardous waste Storage Area – containment" per attached Federal Register
5c	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5c	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
5c	4/23/81 D. Kuta memo "W Operating Records" with attached information specific to Hawthorne Plant, including hazardous and non-hazardous disposal sites and services
5c	4/81 Inmont Corporation Standards for Generator/Treater/Storer of Hazardous Wastes Hawthorne Plant
5c	8/1/85 Schneid to Blanchfield attaching NJDEP 7/30/85 & 7/31/85 Plant Inspection Report – the Plant received minor violations
5c	8/5/85 Blanchfield memo to Schneid attaching 7/23/85 NJDEP acceptance of proposed changes to Part A Application for hazardous waste facility ; drum storage area increase; drum storage pad specifications; storage tank volume corrected; hazardous waste added [chromium, lead]
5c	7/31/91 O'Brien & Gere Submission to NJDEP Bureau of Hazardous Waste Engineering
5c	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
5c	2/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
5c	3/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
5c	5/21/90 "SSPA II Cleanup Plan for Former Inmont Corporation Facility Hawthorne, NJ ECRA Case No. 85563" prepared by Fred C. Hart Associates, Inc.
5c	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.

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Request No.	Identification and Description of Responsive Document
5c	10/23/96 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563 Response to NJDEP Comments Regarding the Remediation of PCB Area Near Building 10' dated January 26, 1996; '4-84 Remedial Action Summary report' dated April 22, 1996 (includes information regarding the discovery of buried drums previously submitted in letters dated December 1, 1995, December 14, 1995 and March 18, 1996."
5c	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
5c	12/14/95 Baker Environmental, Inc. to NJDEP "Response to NJDEP's letter of December 4, 1995 Unanticipated Drums Discovered in the 4-84 Remedial Action Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 NJDEP Emergency Action Line Case No. 95-10-25-1404-48"
5c	3/24/97 B. Diepeveen to UTC "Former Inmont Facility – Hawthorne, NJ" acknowledging that UTC received No Further Action (NFA) from NJDEP, inquiring about status of USTs
5c	6/22/94 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE letter dated May 23, 1994 United Technologies Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" [cover letter only]
5c	1/14/91 D. Webster to UTC "Follow-up From Meeting on January 10, 1991" relating to "Fuel Tank Removal," "PCB Impacted Soil," "Stormwater Drainage Ditch"
5c	1/31/92 T. Charlton [UTC Corporate Environmental Project Engineer] UTC currently reviewing activities related to removal of RCRA tank and tanks in former Tank Farm #2 area.
5c	10/11/91 Baker Environmental, Inc. to D. Webster "NJPDES Permit Application Former Inmont Corporation Facility, Hawthorne, NJ" for BASF review and endorsement
5c	2/13/87 Fred C. Hart Associates, Inc. to Keith Frye [Dir. Environmental Affairs] "Addendums to ECRA submittal for Hawthorne Facility" enclosing NJDEP's letter of deficiency
5c	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
5c	3/30/94 J. McKeon to J. Poff "Hawthorne Facility – RCRA Status" points to be considered prior to agreement to assume 50% costs re pipe removal and soil removal RCRA Storage Pad
5c	4/6/93 NJDEPE to UTC "Inmont Corporation (Inmont) Hawthorne Borough, Passaic County ECRA Case #85563" comments re Baker Environmental, Inc. 1/21/93 correspondence [copy of letter incomplete – only through page 4]
5c	9/17/91 D. Webster to T. Charlton "Your Request for Information" 9/6/91 inquiries, including soil excavated from RCRA tank area, and soil pile near Tank Farm #1, soil from RCRA tank area disposed of as hazardous waste
5c i	10/85 Spill Control Plan A revised 10/85 Spill Contingency Plan contains a diagram of the plant designating areas where drums were stored.
5c i	1974 Spill Control Plan
5c i	4/19/83 Environmental Survey of Hawthorne Plant II
5c i	4/19/83 Environmental Survey of Hawthorne Plant II
5c ii	10/85 Spill Control Plans A revised 10/85 Spill Contingency Plan contains a diagram of the plant designating areas where drums were stored.
5d	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
5d	6/3/91 O'Brien & Gere to W. Mock enclosing 6/1/89 submission to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Closure Summary Report EPA ID #NJD002165371
5d	8/16/88 K. Koneval memo to W. Mock "Disposal of PCB's" attaching EPA list of companies approved for disposal of PCBs
6	2/27/92 NJDEPE correspondence to BASF Corporation "Inmont Corporation Hawthorne, Passaic County NJPDES Permit No. NJ0002453 " responding to BASF 4/22/91 request for modification to NJPDES Permit No. NJ0002453.
6	11/25/86 NJDEP to UTC re United Technologies Corporation Inmont Corporation - Hawthorne Facility 150 Wagaraw Road, Hawthorne Boro, Passaic County ECRA Case #85563" re sampling Plan, recent spill
6	1/1/91 R. Trinks to NJDEPE "NJPDES Permit No. NJ0002453 "responses to excursions noted during 11/30/90 inspection"

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Request No.	Identification and Description of Responsive Document
6	1/10/90 O'Brien & Gere "BASF Corporation Hawthorne, NJ Facility – Meeting Minutes" meeting to discuss stormwater compliance evaluation
6	1/21/94 Paul Rubbe [BASF Northeast Team Leader Ecology & Safety] to NJDEPE "BASF Response to Hawthorne 12/7/93 Compliance Evaluation" providing additional information re deficiencies noted in 9/27/93 letter re NJPDES permit..
6	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility Stormwater Discharge Elimination" seeking elimination of NJPDES DSW.
6	1/5/93 K. Killeen to NJDEPE "BASF Corporation - Hawthorne Site /NJPDES Permit No. NJ0002453 " responding to deficiencies in 12/9/92 Inspection Report result from circumstances beyond BASF control, namely that the cessation of operations resulted in the discharge of stormwater alone.
6	10/18/93 NJDEPE to BASF Corporation "Minor Modification NJ000245"
6	10/21/91 E. Wood to NJDEPE "NJPDES Permit No. 0002453" Initial operations water drawn from Passaic River for non contact cooling water; water returned to river along with storm water.
6	10/31/89 R. Trinks to G. Gagis "Hawthorne Stormwater Permit – October 27 Meeting with NJDEP" meeting purpose – determine discharge limits to be imposed
6	11/2/89 R. Trinks to NJDEPE "Stormwater Discharge from 150 Wagaraw Road Hawthorne NJPDES Permit No. NJ0002453 "
6	12/2/91 R. Trinks to NJDEPE "NJPDES Permit No. NJ0002453 Compliance Evaluation Inspection" BASF responses re 10/16/91 Site Inspection and to 11/15/91 letter
6	12/27/93 NJDEPE to BASF "Compliance Evaluation Inspection BASF Corporation - Chemicals Division NJPDES Permit No. NJ0002453 Class: MIN-IND-DSW Munic./County: Hawthorne Borough, Passaic County"
6	12/28/92 P. Webb to NJDEPE response to NJDEPE 12/14/92 letter clarifying information re noncompliance, request to reconsider parameters of [NJPDES Permit No. NJ0002453 ]
6	2/19/93 J Larry Jameson [BASF Pres Coatings & Colorants Division] to Honorable Scott A. Weiner, NJDEPE, Office of the Commissioner "BASF Corporation/Hawthorne " requesting meeting to resolve the permitting issue that has remained undecided for 6 years [NJPDES Permit No. NJ0002453]
6	2/27/92 NJDEPE to E. Wood "Inmont Corporation Hawthorne, Passaic County NJPDES Permit No. NJ0002453" denying 4/22/91 request for modification of permit
6	2/3/89 W. Mock to PVSC "Discharge of Monitoring Well Water to PVSC Ref: Letter D'Ascencio/Mock 10/16/86" requesting permission to discharge of approximately 1500 gallons of monitoring well and clean water into PVSC connection.
6	3/20/89 W. Mock memo "RCRA Development Well Water" 26 drums of well water discharged to PVSC. Operations was reviewed by PVSC rep. who also performed a spot pH check
6	3/30/93 "NPDES Notes" handwritten entries for specific dates in 1993 noting heavy rainfalls, increased river flow, discolored discharges [fluorescein], odorous discharges, nitrobenzene odor-water, river back-charging over weir,
6	3/7/85 NJDEP to W. Mock "NJPDES Permit No. NJ0002453 Effective Date: May 1, 1985" enclosing Final NJPDES /DSW Permit and Notice of Authorization to discharge pollutant s to Passaic River...
6	4/15/93 NJDEPE to P. Rubbe "New Sampling Point for Discharge Serial Number (DSN)-001 NJPDES Permit No. NJ0002453 BASF Corporation Hawthorne, Passaic County"
6	4/18/94 P. Webb to P. Rubbe "Hawthorne Inspection – April 18, 1994" purpose of NJDEPE inspection to allow State inspector to propose revocation of existing NJPDES Permit No. NJ0002453 and application for general stormwater discharge permit. "
6	4/9/87 H. Hintz to NJDEP "NJPDES Permit NJ0002453 " requesting modification to permit as manufacturing operations have ceased, presently storm water only discharge
6	5/14/93 K. Killeen to B. Leiken "Hawthorne, New Jersey Site" Summary of 4/15/93 meeting agreements re water permitting issues.
6	5/15/90 W. Mock to R. Trinks "Stream Discharge to Passaic River Special Analytical Work"
6	6/14/94 NJDEPE to P. Webb "BASF Corporation Hawthorne Borough, Passaic County NJPDES Permit No. NJ0002453 NJPDES Permit Revocation" enclosing draft Revocation Notice, Public Notice and Fact Sheet (not attached) notification of NJDEPE intention to revoke permit



Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
6	6/21/94 I. Polyak to R. Awn "Hawthorne – Final Notice of Nonresponse" Stormwater NJPDES Permit Program staff member corrected problem that caused the Final Notice of Nonresponse to be mailed; issue considered resolved; attached: Final Notice of Nonresponse received 6/2/94 with 10/18/93 NJDEPE to BASF Corporation "Minor Modification NJ000245"
6	6/3/87 Harold Hintz, Jr. [BASF Mgr. Environmental Affairs] to NJDEPE BASF Corporation unable to determine source of " 'discharge of unknown chemicals in unknown amounts' reported ...April 20, 1987 letter."
6	6/30/93 P. Webb to NJDEP "BASF Corporation – Hawthorne Site NJPDES Permit No. NJ0002453 Case No. 93-6-25-1149-24" confirmation of "verbal notification to the DEPE Hotline on June 25, 1993 of an exceedance of BASF's NJPDES Permit (#0002453) limit for color on June 1, 1993."
6	7/14/93 P. Webb to NJDEPE "Request for General Permit Authorization (RFA)" enclosing completed and signed request for Hawthorne, New Jersey facility that closed in 1986
6	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
6	7/23/93 P. Webb to NJDEPE enclosing Certification of Closure of Wastewater Treatment Plant for BASF's Hawthorne plant
6	7/23/93 W. Mock handwritten notes Bldgs 17 & 18 river pumps
6	7/24/90 R. Trinks to A. Gillen "Ecology Issues at Hawthorne" memo with handwritten revisions
6	7/27/93 P. Webb to NJDEPE "Closure Requirements BASF Corporation - Hawthorne Facility NJPDES Permit No. NJ0002453 Hawthorne Borough, Passaic County" response to 6/24/93 letter
6	8/25/93 P. Webb to NJDEPE "Application for Termination of BASF Corporation – Hawthorne Facility NJPDES Permit No. NJ0002453 Hawthorne Borough, Passaic County" enclosing completed application re non-contact cooling water discharge
6	8/4/93 P. Webb to NJDEPE "Closure Requirements BASF Corporation - Hawthorne Facility NJPDES Permit No. NJ0002453 Hawthorne Borough, Passaic County" restatement of facts in 7/27/93 letter
6	8/5/94 NJDEPE to P. Webb "BASF Corporation Hawthorne Borough, Passaic County NJPDES Permit No. NJ0002453 NJPDES Permit Revocation" enclosing Final Revocation Notice NJPDES Permit No. NJ0002453 and authorizing stormwater discharge under general permit NJPDES Permit No. NJ0088315; attachment: 10/1/94 NJPDES Permit No. NJ0088315, Stormwater Pollution Prevention Plan Preparation Certification , Stormwater Pollution Prevention Plan Implementation and Inspection Certification , 2/94 Industrial Stormwater Pollution Prevention Plan Guidance
6	L. Mellen [BASF Group Controller] to NJDEPE responding to NOV issued following 12/2/92 site inspection. Attached: 12/2/92 NOV "none of the COD or TSS violations were 'Serious' violations as defined by the Act."
6	4/30/96 Baker Environmental, Inc. to NJDEP "Request for Permission to Discharge Development Water into Well IW1-92 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
6	1/30/96 R. Awn to W. Pearson "Hawthorne - Environmental Cleanup Costs for Sale" current status: site dismantled to concrete slabs, expect there is additional soil contamination beneath slabs.
6	10/29/98 Brian Diepeveen to NJDEP "Response to NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) – Former Inmont Facility Hawthorne, Passaic County: ISRA Case No. 85563" responding on behalf of UTC
6	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
6	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
6	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
6	5/23/90 NJDEP to UTC "Industrial Establishment Inmont Corporation - Hawthorne Facility ("Inmont") Location: 150 Wagaraw Road, Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Transfer of Stock Cleanup Plan Dated: February 28, 1990 ECRA Case #85563" accepting plan with noted conditions.
6	7/18/89 H. Hintz, Jr. to R. Trinks "Hawthorne NJPDES Permit Renewal" attachment: 6/12/89 NJDEP to Inmont Corp. "NJPDES Permit Expiration 900430 NJPDES Permit No. NJ0002453 Category: C – Thermal SW Discharge County: Passaic"



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6	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
6	Undated "Application to Discharge Wastewaters and residuals to the State's Land and Water" Renewal includes amounts of Passaic River water used for specific processes to be discharged back to river; "Required Statement ...The intake water is not treated in any way prior to discharge"; "Hawthorne Water Usage" flow chart of city and river water usage and amounts to specific areas/processes, and discharge locations (Sanitary Sewer or Passaic River)
6	10/11/91 Baker Environmental, Inc. to D. Webster "NJPDES Permit Application Former Inmont Corporation Facility, Hawthorne, NJ" for BASF review and endorsement
6	2/13/87 Fred C. Hart Associates, Inc. to Keith Frye [Dir. Environmental Affairs] "Addendums to ECRA submittal for Hawthorne Facility" enclosing NJDEP's letter of deficiency
6	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
6a	4/12/73 W. J. Barth, Environmental Control Engineer memo to Ben D'Armiento "Water Pollution Control"
6a	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes. About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook."
6a	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
6a	6/14/90 W. Mock memo to R. Trinks "PVSC Sewer connection Permit" attaching 6/11/90 PVSC notification of expiration of Sewer Connection Permit #14404910, only sanitary waste acceptable.
6a	9/8/89 W. Mock memo to K. Koneval "Disposition of UTC Generated ECRA Monitor Well Water" contacted PVSC. Asked if PVSC would accept continuous well water discharge, was advised if affluent analysis was "somewhat consistent, continuous treated discharge would be permitted." The former river water ground storage reservoir is "directly connected to the NPDES brook and the Passaic River."
6a	Undated hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Bldg. 10; Storage Pad "; attachment: 6/22/89 Envirotech Research, Inc report attached
6a i	4/7/72 Hanzl memo to F. Moss, Plant Mgr. Re Hawthorne Water Pollution Problems – [manufacturing] "cooling water, now being dumped into the sanitary sewer, could be diverted to the storm sewer and returned to the Passaic River. (Since the industrial waste and sanitary sewage end in one common line...)." The memo specifies by building the process waste waters, and also relates how the river water is used in the plant.
6a i	4/8/82 NJDEP summarizing meeting and the groundwater investigation, NPDES violation
6a i	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
6a i	1985 "Water Supply & Discharge"
6a ii	11/18/85 Arvidson memo to Burachinsky "Hawthorne Environmental Review" R. Trinks 11/18/85 memo attachment "Il River Water – Spill Control " usage of river water – non-contact water cooling water and storm water runoff are discharged to Passaic River under NJPDES permit #NJ0002453; effluent sampling results
6a ii	8/27/73 memo "Air Pollution" "1) A roto-clone with a water wash is used to exhaust all fumes, pigment powders being generated in Tanks 1 through 9 and including varnish tanks, Abbes and agis. Wash drains directly into sanitary sewer system."
6a ii	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
6a iii	11/8/72 Barth memo to Ben D'Armiento "Water Pollution Control – Lime System"
6a iii	3/25/71 Hanzl memo to Bowers "Hawthorne Water Pollution – CE164 – Waste Neutralization System"
6a iii	3/6/73 W. Barth memo to J. Marossy "Water Usage & Sewer Flow – Corrections Needed"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
6a iv	11/18/85 Arvidson memo to Burachinsky "Hawthorne Environmental Review" R. Trinks 11/18/85 memo attachment "II River Water – Spill Control " usage of river water – non-contact water cooling water and storm water runoff are discharged to Passaic River under NJPDES permit #NJ0002453; effluent sampling results
6a v	4/10/72 Waste Effluent Survey (For Industries Served by the Passaic Valley Sewerage Commissioners) – Amounts discharged to sanitary sewer, and to "storm sewer, river or ditch;" characteristics of plant discharges
6a v	5/14/71 L. Altamirano memo to F. Moss "Job Title: Tank Scrubber & Ecology Program...."
6a v	5/5/72 Waste Effluent Survey (For Industries Served by the Passaic Valley Sewerage Commissioners) – Amounts discharged to sanitary sewer, and to "storm sewer, river or ditch;" characteristics of plant discharges
6b	4/12/73 W. J. Barth, Environmental Control Engineer memo to Ben D'Armiento "Water Pollution Control"
6b	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes. About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook."
6b	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 131: floor drains to Borough of Hawthorne sewer, and from there to Passaic Valley Sewer System. No solvents were poured into the floor drains.
6b	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 132: floor drains
6b	4/68 Interchem Engineering Dept. Sewer System Plot Plan Dwg, I.C. 697
6b i	1/30/87 UTC to NJDEP BISE Sampling Plan Addendum by Fred C. Hart Associates." 5. A review of available information indicates the sanitary sewer as the discharge point for floor drains."
6b i	11/13/72 Barth memo to Dorothy Bowers observations – floor drains to storm discharge; "lime silo not in operation"
6b i	1982 USEPA Questionnaire Organic Chemicals, Plastics, and Synthetic Fibers Industry re 1982 Production
6b i	3/28/86 USEPA to Inmont re 11/6/85 Inspection "Plant Description [paragraph three] The facility maintains one active discharge. Discharge 001 consists of non-contact water used for cooling kettles. All process waters are discharged to the sewer (PVSA)...."
6b i	7/20/72 Gipson Notice to Fran Moss C.E.R. approval for Filter Press Modification [page 2] "Justification: By diverting cooling waters back to the Passaic River, we have reduced our flow to PVSC sewer line to approximately 1.1 million gallons per day....."
6b i	9/12/86 BASF forwarding to UTC NJDEP 9/9/86 Notice of Contamination of Municipal Wells - NJDEP findings & determinations
6b i	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
6b i	4/5/68 Interchem Engineering Dept. "Sewer System Plot Plan"
6b i	5/26/89 W. Mock memo to K. Koneval "Storm Water Run-off Diversion" During the last two weeks heavy rains the Passaic River back purged and flooded the plant storm sewer
6b i	8/23/89 Trinks memo to U. Soenksen "Hawthorne Water Issues" stormwater discharged to Passaic River
6b ii	11/13/72 Barth memo to Dorothy Bowers observations – floor drains to storm discharge; "lime silo not in operation"
6c	4/12/73 W. J. Barth, Environmental Control Engineer memo to Ben D'Armiento "Water Pollution Control"
6c	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes. About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook."
6c	10/13/88 W. Mock to U. Soenksen "Bldg 6a Pigment Contamination/Storm Sewer 10/10/88" reporting spill

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
6c	10/13/88 W. Mock to Passaic Valley Sewer Commission [PVSC] "Temporary Storm Sewer Diversion 14404910-31058-0141"
6c	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved. 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
6c	12/4/89 O'Brien & Gere to K. Koneval "BASF Corporation Hawthorne, New Jersey Facility – Technical Approach" proposal for remedial options, addressing certain areas, such as PCB contaminated soil, former RCRA drum storage pad, storm sewer –fluoroscetin discharges, etc.
6c	7/24/90 Fred C. Hart Associates, Inc. letter to R. Trinks "ECRA Soil Remediation at the Former Inmont Corporation Hawthorne Facility"
6c	8/26/92 D. Webster to Hawthorne File "Phone Conversation with Troy Charlton [UTC] – 8/25/92" UTC status meeting with NJDEP
6c	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
6c	4/68 Interchem Engineering Dept. Sewer System Plot Plan Dwg, I.C. 697
6c i	3/16/87 NJDEP DWR re Storm Water Runoff - Discharge Surveillance Report attached with schematic of flow sequence
6c i	4/10/72 Waste Effluent Survey (For Industries Served by the Passaic Valley Sewerage Commissioners) – Amounts discharged to sanitary sewer, and to "storm sewer, river or ditch;" characteristics of plant discharges
6c i	5/5/72 Waste Effluent Survey (For Industries Served by the Passaic Valley Sewerage Commissioners) – Amounts discharged to sanitary sewer, and to "storm sewer, river or ditch;" characteristics of plant discharges
6c i	11/18/85 Arvidson memo to Burachinsky "Hawthorne Environmental Review" R. Trinks 11/18/85 memo attachment "II River Water – Spill Control " usage of river water – non-contact water cooling water and storm water runoff are discharged to Passaic River under NJPDES permit #NJ0002453; effluent sampling results
6c l	3/16/75 NJDEP Bureau of Air Pollution Control Standby Plans chart lists buildings, products, processes
6c l	9/24/75 Plot Plan CE-699 includes list of equipment; storm drains, catch basins
6c i	9/24/75 Plot Plan Hawthorne Inmont Corporate Engineering Dept. buildings, storm drains, manholes, catch basins depicted in addition to locations of tanks with legend to list contents
6c ii	9/24/75 Plot Plan Hawthorne Inmont Corporate Engineering Dept. buildings, storm drains, manholes, catch basins depicted in addition to locations of tanks with legend to list contents
6ci	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 106 : Plant drainage
6ci	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
6ci	1/29/82 memo re NJDEP inspection during which inspectors reviewed maps that showed storm, sanitary and process sewers
6cii	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 106: Plant drainage
6cii	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 91-93: Though Gus can't recall the time frame, he does recall "observing a visible oil sheen" in the outflow drainage ditch to the river. The drainage ditch was unlined."
6civ	1/13/89 Hawthorne Decommissioning Progress Report #13: 12/15-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
6civ	1/20/89 Hawthorne Decommissioning Progress Report #14: 1/1-15/89 highlights and individual building status, including storage, transport and disposal of hazardous waste
6d	7/29/88 Topographic Survey BASF Corporation - "Inmont Site Borough of Hawthorne Passaic County, New Jersey " shows locations of buildings, monitoring wells, manholes, manhole/inlets
6d	2/5/88 O'Brien & Gere to R. Cuniberti "Hawthorne facility Demolition/Decommissioning Specifications And Procedures"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
6d	1/21/88 O'Brien & Gere to J. Gebrian "Decommissioning/Demolition Specifications for your review" "Location of the Property Description of the Work BASF Corporation Inmont Site Hawthorne, New Jersey" includes Site Plan with legend that identifies buildings, their use, storage areas, sewer locations
6d	1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, New Jersey Exhibit 'B' 56 of 57" showing "Hazardous Substance/Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge
6d	4/68 Interchem Engineering Dept I.C. 697 "Sewer System Plot P[illegible] Exhibit "B" 57 of 57]
6d	5/22/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
6d	6/6/91 "Former Inmont Corp. Facility Hawthorne, New Jersey Soil Cleanup, Soil Erosion and Sediment Control Plan McLaren Hart Environmental Corp." shows Building locations, location of separate sanitary and storm water line and manholes, former tank farms
6d	8/89 O'Brien & Gere "Existing Site Plan BASF Corporation Hawthorne, New Jersey ECRA Decommissioning & Demolition Project" shows building locations, including RCRA Pad, sanitary sewer, storm sewer, manholes, drainage inlets, process & acid sewer [some marginalia]
6d	8/89 O'Brien & Gere "Pre-Demolition Site Plan" showing "Hazardous Substance / Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge [some marginalia]
6d	Undated BASF Corporation "Hawthorne Site - Site Locations not Investigated" sanitary sewer, storm sewer, process and acid sewer, manholes, drainage inlet, former transformer pad, USTs marginalia indicating location of former drum storage areas, corrections to Use/Process legend
6d	Undated BASF Corporation "Hawthorne Site Overall Site Plan" showing "Hazardous Substance/Waste Storage Areas" and legend which indicates each building's use/manufacturing process, non-point storm sewer discharge point, point storm sewer discharge, PVSC Flume
6d	Undated BASF Corporation "Hawthorne Site UTC's Areas of Environmental Concern" [colorized map] Pump house access road, "oily substance area," storm sewer discharge location of former transformers, tanks, tank farms
6d	Undated Lan Associates "United Technologies Corp./Inmont ECRA Hawthorne, New Jersey " "Sanitary & Storm Sewer Location Plan" also showing locations: of buildings, drum storage, manholes, catch basins. Marginalia indicates missing items such as missing storm sewer, additional drum storage, post-it "UST?? Bldg. 27"
6d	11/1/85 "Inmont Corp Boiler House Blow Down System Drainage Study" two views show some of process sewer, sanitary sewer and storm drains, trenches
6d	11/9/88 "Job Meeting – 11/9/88 BASF Extra/Underscoped Work" 5. Sewer Cleaning BASF Drawings "were not complete or entirely accurate" "Drum dumping into ink pool As requested, OHM dumped the ink from 34 drums into the storage pool which also contains ink from Bldg. #30 [Warehouse] tanks...."
6d	12/21/93 J. McKeon fax to W. Mock "Site Map Showing Historical Areas of Environmental Concern UTC/Inmont Hawthorne, NJ"
6d	3/20/89W. Mock to G. Gaggis, H. Hintz, K. Koneval, U. Soenksen, T. Szelest "RCRA Development Well Water" attached : 1/23/89 Laboratory Resources Inc. sampling analysis 3/15/89 W. Mock to PVSC Agreeing to PVSC Rules & Regs 3/1/89 letter "Discharge of Liquid Waste" 2/10/89 W. Mock to PVSC re Discharge of Monitoring Well Water to PVSC 1/3/89 W. Mock to PVSC requesting permission to discharge 1500 gallons of monitoring well and cleaning water to PVSC and attaching 8/17/88 O'Brien & Gere Wastes Characterization Results sent to DuPont 3/13/89 PVSC Rules & Regulations Concerning Discharges to the PVSC Treatment Works
6d	6/3/91 O'Brien & Gere to W. Mock enclosing 6/1/89 submission to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Closure Summary Report EPA ID #NJD002165371
6d	4/5/68 Interchem Engineering Dept. "Sewer System Plot Plan"

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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
6d	9/24/75 Plot Plan Hawthorne Inmont Corporate Engineering Dept. buildings, storm drains, manholes, catch basins depicted in addition to locations of tanks with legend to list contents
6d	8/15/96 BASF Corporation "Hawthorne Site - Site Demolition Plan & Contractor Laydown Area" Drawing Number 89-1323; 9/21/96 BASF Corporation "Hawthorne Site – Finished Grades and Underground Piping Plan" Soil Erosion and Sediment Control Plan" Drawing Number 89-1324 11/96 BASF Corporation "Hawthorne Site – Soil Erosion and Sediment Control Plan" Drawing Number 89-1336
7	1/21/94 Paul Rubbe [BASF Northeast Team Leader Ecology & Safety] to NJDEPE "BASF Response to Hawthorne 12/7/93 Compliance Evaluation" providing additional information re deficiencies noted in 9/27/93 letter re NJPDES permit..
7	10/21/91 E. Wood to NJDEPE "NJPDES Permit No. 0002453" Initial operations water drawn from Passaic River for non contact cooling water; water returned to river along with storm water.
7	10/31/89 R. Trinks to G. Gegis "Hawthorne Stormwater Permit – October 27 Meeting with NJDEP" meeting purpose – determine discharge limits to be imposed
7	2/27/92 NJDEPE to E. Wood "Inmont Corporation Hawthorne, Passaic County NJPDES Permit No. NJ0002453" denying 4/22/91 request for modification of permit
7	2/3/89 W. Mock to PVSC "Discharge of Monitoring Well Water to PVSC Ref: Letter D'Ascencio/Mock 10/16/86" requesting permission to discharge of approximately 1500 gallons of monitoring well and clean water into PVSC connection.
7	4/9/87 H. Hintz to NJDEP "NJPDES Permit NJ0002453 "requesting modification to permit as manufacturing operations have ceased, presently storm water only discharge
7	4/9/90 H. Hintz Jr. to D. Webster "Hawthorne Cleanup Levels" attached: 4/3/90 D. Webster to J. Poff [in-house counsel] "Hawthorne Cleanup Levels" attached: 4/2/90 H. Hintz Jr. to D. Webster "Hawthorne Cleanup Levels"
7	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
7	12/19/86 General Information Submission BASF Corporation, Chemicals Division Hawthorne Facility submitted to NJDEP ECRA Notice Submission
7	3/7/85 NJDEP to P. Mock "NJPDES Permit No. NJ0002453 Effective 5/1/85" enclosing NJPDES/DSW Permit and Notice of Authorization to discharge pollutants to Passaic River. [expiration date 4/30/90]
7	Undated "Application to Discharge Wastewaters and residuals to the State's Land and Water" Renewal includes amounts of Passaic River water used for specific processes to be discharged back to river; "Required Statement ...The intake water is not treated in any way prior to discharge"; "Hawthorne Water Usage" flow chart of city and river water usage and amounts to specific areas/processes, and discharge locations (Sanitary Sewer or Passaic River)
7a	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste Generator/Transporter information.
7a	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste generator/Transporter information
7a	1/23/89 W. Mock memo to D. Webster "PJP Landfill – ref. Praschak to Dis. 10/18/88; Praschak to Dis. 12/20/88" Chart created to respond to NJDEP Request for Information Transporters used, Quantities
7a	1979 and 1980 Invoices – backup documents for charted information provided to W Mock to forward to D. Webster
7a	1981 through 1986 NJDEP Hazardous Waste Generator Annual reports
7a	1986 Hazardous Waste Generator Annual Report forwarded to NJDEP 2/27/87
7a	1986 TSDF Annual Report forwarded to NJDEP 2/27/87
7a	4/1/89 W. Mock memo w/enclosures to D. Webster "High Point Sanitary Landfill – Ref: Letter Hays/ Distribution 3/21/89" Hawthorne employee information; types of waste and waste services; attachment: Hazardous Waste Generator Annual Reports 1982 to 1987
7a	9/26/77 Gasson memo to Snyder "Waste Disposal" Specifies landfills where "regular material" is disposed of; "Liquid waste, Red Label, or contaminated material goes to Scientific Chemical, Newark, New Jersey and is burned."

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
7b	11/12/86 memo "Demolition Schedule Hawthorne Site" attachment: 3/16/86 memo "Environmental Situation in Holland & Hawthorne"
7b	1/23/89 K. Koneval memo to T. Szelest "Hawthorne / ETC QA/QC Data" data for analysis of Passaic River Silt in the tanks from Bldg. 18 be reviewed.
7b	1/27/89 T. Szelest to K. Koneval "Hawthorne / ETC Laboratory Data" consulted with both K. Hillig and John Moote re ETC Lab results of Passaic River silt in Bldg 18 tanks.
7b	1/5/88 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen "NJDEP Permit" attachment: 12/24/87 NJDEP TO J. Gebrian "Response of comments and Issuance of Final Major Modification of NJPDES DSW Permit NJ0002453" re closure of an underground hazardous waste storage tank.
7b	10/21/88 Hawthorne Decommissioning Progress Report #8: 10/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
7b	11/29/88 Hawthorne Decommissioning Progress Report #10: 11/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
7b	11/7/88 Hawthorne Decommissioning Progress Report #9: 10/16-31/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
7b	12/13/88 Hawthorne Decommissioning Progress Report #11: 11/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
7b	12/20/88 T. Szelest letter to OHM renewing requests for background information, e.g., ETC Lab information; OHM background documentation of regional studies of dioxin contamination of Passaic River
7b	2/22/89 T. Hays to Eric Fox, ECRA Case Mgr. NJDEP confirming 2/22/89 phone conversation re sampling of Passaic River silt prior to use showing evidence of " 'lesser' dioxin hepta-, hexa-, and octa-dioxin."
7b	2/22/89 phone conversation re sampling of Passaic River silt prior to use showing evidence of " 'lesser' dioxin hepta-, hexa-, and octa-dioxin."
7b	3/20/89W. Mock to G. Gagis, H. Hintz, K. Koneval, U. Soenksen, T. Szelest "RCRA Development Well Water" attached : 1/23/89 Laboratory Resources Inc. sampling analysis 3/15/89 W. Mock to PVSC Agreeing to PVSC Rules & Regs 3/1/89 letter "Discharge of Liquid Waste" 2/10/89 W. Mock to PVSC re Discharge of Monitoring Well Water to PVSC 1/3/89 W. Mock to PVSC requesting permission to discharge 1500 gallons of monitoring well and cleaning water to PVSC and attaching 8/17/88 O'Brien & Gere Wastes Characterization Results sent to DuPont 3/13/89 PVSC Rules & Regulations Concerning Discharges to the PVSC Treatment Works
7b	4/27/89 "ECRA Demolition/Decommission Report Summary Outline April 1989"
7b	6/1/89 K. Koneval memo to R. Foster Summary of cleanup program to prepare for site closure in compliance with state laws/regs. Background of purchase, BASF operation and closing dates included. Analytical data from RCRA soil sampling submitted to NJDEP 11/23/88"...
7b	6/3/91 O'Brien & Gere to W. Mock enclosing 6/1/89 submission to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Closure Summary Report EPA ID #NJD002165371"
8	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes. About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook."
8	11/25/86 NJDEP to UTC re United Technologies Corporation Inmont Corporation - Hawthorne Facility 150 Wagaraw Road, Hawthorne Boro, Passaic County ECRA Case #85563" re sampling Plan, recent spill
8	10/11/00 A. Gagis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 68 –70: Recalls 2 spills
8	10/11/00 A. Gagis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 91-93: Though Gus can't recall the time frame, he does recall "observing a visible oil sheen" in the outflow drainage ditch to the river. The drainage ditch was unlined."
8	4/12/89 B. Zollner to K. Koneval "Hawthorne Transformers/PCB"

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Request No.	Identification and Description of Responsive Document
8	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility ECRA Case No. 87117" responding to 11/30/89 NJDEP letter (attached)
8	1/8/90 K. Koneval memo to J. Poff [in-house counsel] "Hawthorne – UTC ECRA" attaching UTC/ Fred C. Hart Associates, Inc. letter to NJDEP enclosing 12/13/89 Supplemental Sampling Plan Addendum II for Former Inmont Facility Hawthorne, New Jersey & prepared for UTC
8	10/21/88 W. Mock handwritten notes re fluorescein spill
8	10/23/78 A. Schneid "Procedure for Handling Dichlorobenzidine (DCB) (Obsolete All Other Procedures)"
8	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved. 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
8	10/5/88 W. Mock to U. Soenksen "Bldg. 6 Pigment Pit Sludge Spill 9/27/88 – Meeting w/ City of Paterson Board of Health – Ref. Letter Mock/ Soenksen 9/29/88"
8	11/14/91 D. B. Kelly Security Agency Incident Report oil poured into sewer
8	11/14/91 AETC Field Services Shipping/Receiving Form procedures and materials used to clean up 4-5 quarts of motor oil poured into storm drain
8	11/19/91 fax D. B. Kelly to W. Mock of J. Smith [D.B. Kelly] memo to Timothy Hill "BASF –Spill" report on motor oil being poured into "sewer line."
8	11/19/91 L. Paul fax to W. Mock 11/19/91 W. Mock to U. Soenksen "Hawthorne Spill Incident 11/14/91 Ref: NJDEPE Case #91-11-14-1450-28" A D. B. Kelly security guard changed his car oil, then dumped the used motor oil into the storm water catch basin
8	11/21/88 W. Mock handwritten notes re fluorescein spill to brook
8	11/28/88 W. Mock handwritten notes re fluorescein spill
8	11/30/91 AETC invoice for Emergency Spill Control Cleanup & 11/15/91 BASF PO re same;
8	12/4/91 R. Trinks to NJDEP "Spill Incident Report Case #91-11-14-1450-28 BASF Corporation , Hawthorne, New Jersey"
8	12/4/91 R. Trinks to NJDEP "Spill Incident Report Case #91-11-14-1450-28 BASF Corporation , Hawthorne, New Jersey"
8	12/7/88 W. Mock to NJDEP "Fluorescein Contamination Passaic River 11/27-28/88"
8	4/16/87 Handwritten notes recording time, contacts/entities attached 4/20/87 notes samples, testing procedures and labs to receive samples, attached 4/20/87 "Fluorescein Incident"
8	5/11/95 J. McKeon to P. Rubbe "Incident 19512501" attached: 5/11/95 J. McKeon to NJDEP "Discharge Confirmation" "Types of Hazardous Substances Discharge - Not Hazardous Substance" "Quantity of Substance Discharged – About two ounces fluorescein dissolved in storm and dust control water" and photos
8	6/11/96 Rust Environment & Infrastructure to B. Diepeveen enclosing drawing of excavation Area 1 submitted to NJDEP re Merck's proposed Passaic River sediment removal project [cover letter only]
8	6/13/89 K. Koneval to NJDEP "BASF Corporation – Hawthorne, New Jersey RCRA Underground Storage Tank Removal" enclosing Standard Reporting Form and Site Assessment Compliance Statement
8	6/3/96 Merck to B. Diepeveen enclosing proposed access agreement and plot plan [neither attached] and scope of work re excavation of Passaic River sediment, which have shown elevated levels of lead and mercury.
8	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attached: Townley Research and Consulting, Inc. sampling analysis; attached: O'Brien & Gere log sheet noting PCB Sample locations and readings; attached: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attached: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
8	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
8	9/27/88 K. Fry to P. Heinze, W. Schaefer "Chemical Release - Hawthorne Site – Incident #270" "revision" reporting the 9/26/88 spill of DCB, truck driver error



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Request No.	Identification and Description of Responsive Document
8	9/27/88 U. Soenksen "Preliminary Spill Report re Hawthorne, NJ Site" report of events leading up to, and including spill, truck driver error
8	9/29/88 W. Mock memo to U. Soenksen "River Discharge – 9/21-23/88"
8	9/29/88 W. Mock to U. Soenksen "Bldg. 6 Pigment Pit Sludge Spill 9/26/88"
8	4/12/73 W. J. Barth, Environmental Control Engineer memo to Ben D'Armiento "Water Pollution Control"
8	1979 OSHA settlement in 1979 re DCB (dichlorobenzidine) violation, measures to correct, and procedures to implement re handling, decontamination
8	4/23/82 Factory Mutual Engineering Association Plot Plan United Technologies Corp., et al. "Inmont Corp." Hawthorne, N.J. Serial 91147 Index 30445.22 surveyed by M.G. Woodward [Tank 9 contains 3,000 gallons xylol]
8	7/21/82 Memo reporting Oil Spill Incident
8	1/29/82 Spill Control Plan memo re NJDEP inspection attachments re 1979 mineral oil spill. The spill was shoveled off Bldg #9 floor with the remainder "sopped up" with cleaning solvent "an industrial grade of mixed xylenes." About 5-10 gallons of solvent rinse was dumped into the industrial sewer drain. The drain was clogged and overflowed into a drain, which discharged to the brook.
8	2/28/90 Fred C. Hart Associates, Inc. Cleanup Plan for Inmont Corporation Facility Hawthorne, New Jersey prepared for United Technologies Corporation
8	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
8	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
8	10/5/88 Hawthorne Decommissioning Progress Report #7: 9/15-30/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
8	12/7/88 W. Mock to NJDEP "Fluorescein Contamination Passaic River 11/27-28/88"
8	7/20/88 Hawthorne Decommissioning Progress Report #2: 7/1-15/88 highlights and individual building status, including storage, transport and disposal of hazardous waste
8	9/12/91 Advanced Environmental Technology Corporation invoice for solvent spill clean up and disposal (manifest NJA1163409) attached: 9/6/91 O'Brien & Gere to D. Webster "...six drums generated during the decommissioning of the drum storage pad,..."
8	5/19/86 Canonie Environmental 5/19/86 to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank; attached memos: 4/3/86 to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning; 8/25/88 W. Mock memo to K. Koneval "Removal of Underground Tanks – Tank Farm #2 – Building 4"; 5/27/86 P. Arvidson fax to W. Mock to review Triolo 5/7/86 memo; 5/7/86 Triolo memo to file re "BASF/Inmont, Hawthorne, NJ – Underground Tanks Excavation, Soil Sampling and Observations" ; 5/28/86 P. Arvidson to Fred C. Hart Associates Inc. response to 5/7/86 Triolo memo; 5/1/86 R. Trinks memo to W. Hanzl "Underground Tank Removal Program / Hawthorne"
8	11/19/86 R. Trinks responding to 10/24/86 USEPA Region II questions re possible violation of Oil Pollution Prevention Regulation storage tanks above- and below-ground
8	5/6/95 Draft J. McKeon to P. Rubbe "Incident 19512501" 5-10 foot section of ground of green material that reportedly had come up out of the ground during demolition
8	9/8/97 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" response to 5/12/96 Cleanup Plan Progress Report, telephone conversation of NJDEP & Baker Environmental, Inc. on 5/12/97 & 8/18/97 and 9/3/97 Site visit.
8	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere

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8	11/89 NJDEP to BASF Corporation "BASF Corporation 150 Wagaraw Road Hawthorne Boro, Passaic County ECRA Case: #87117 BASF Decommissioning and demolition Report dated: October 18, 1989" additional information requested before No Further Action proposal can be evaluated "4. provide details ...sludge spill"
8	12/14/95 Baker Environmental, Inc. to NJDEP "Response to NJDEP's letter of December 4, 1995 Unanticipated Drums Discovered in the 4-84 Remedial Action Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 NJDEP Emergency Action Line Case No. 95-10-25-1404-48"
8	12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" responding to 11/2/95 and 11/20/95 telephone conversations re 10/25/95 discovery of four buried drums. Spill of 80 gallons of spent acid reported 11/1/95, additional details provided by Baker Environmental, Inc. 11/2/95; attached: 12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" reviewed RARs 3/24/95, 4/11/95, 4/17/95 and 4/26/95 and 3/26/95 " 'Comments to Draft NJPDES DGW Permit' and 3/31/95 'Comments to Draft RAW Addendum' "
8	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
8	10/11/91 Baker Environmental, Inc. to D. Webster "NJPDES Permit Application Former Inmont Corporation Facility, Hawthorne, NJ" for BASF review and endorsement
8	2/13/87 Fred C. Hart Associates, Inc. to Keith Frye [Dir. Environmental Affairs] "Addendums to ECRA submittal for Hawthorne Facility" enclosing NJDEP's letter of deficiency
8	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
8	6/28/91 McLaren Hart to D. Webster "Former Inmont Facility, Hawthorne, NJ" attached: 6/6/91 McLaren Hart to NJDEP "Request for Freshwater Wetlands Permit, Statewide General Permit Number 4." Attachment A "Project Description"
8a	10/7/86 Arvidson, BASF VP Ecology to Schneidermeyer, UTC Dir. Environmental Affairs w/ attached response to NJDEP 10/2/86 letter rejecting NJDEP test analysis of onsite wells
8a	6/25/85 R. Trinks handwritten notes re preliminary results showing high levels of nitrobenzene
8a	6/79 "Report Phase I Groundwater Contamination Study Calgon Site, Hawthorne, NJ prepared for Shanley & Fisher by Dames & Moore June 1979 "
8a	11/19/86 R. Trinks responding to 10/24/86 USEPA Region II questions re possible violation of Oil Pollution Prevention Regulation storage tanks above- and below-ground
8b	6/2/95 Industrial Corrosion Management, Inc. (ICM) "Tentative Fax Preliminary Results"
9	5/14/96 Rust Environment & Infrastructure Drawing Number 35399-03 "Plan and Sections Excavation Area 1 Sheet 5 excavation of Passaic River sediments
9	1/3/85 P. Mock [United Technologies Inmont Sr. Project Engineer] to NJDEP "NJPDES Permit No. NJ0002453 " reviewed and noted change to existing permit in current draft permit. "
9	12/28/92 P. Webb to NJDEPE "BASF Corporation /NJPDES Permit No. NJ0002453 DMR for Period Ending 9/30/92" response to NJDEPE 12/14/92 letter re 9/3/92 TSS non-compliance. "The existing NJPDES permit was written to regulate withdrawal, use, and discharge of noncontact cooling water with an allowance for 'netting out' pre-existing river water contamination." Currently the only discharge is stormwater runoff, as the plant ceased operations in 1986. attached: 12/14/92 NJDEPE to BASF Corp "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453" and attached 12/22/92 E. Madzy to P. Webb e-mail "Hawthorne " with explanation of DMR for period Ending 9/30/92
9	4/18/97 "Remedial Action Report Off-Site Sediment and Soil Removal Action" prepared for Merck & Co., Inc. for the former Calgon Corp. Metasol Plant prepared by Rust Environment & Infrastructure
9a	12/4/89 O'Brien & Gere to K. Koneval "BASF Corporation Hawthorne, New Jersey Facility – Technical Approach" proposal for remedial options, addressing certain areas, such as PCB contaminated soil, former RCRA drum storage pad, storm sewer –fluorescein discharges, etc.
9aii	11/21/88 W. Mock handwritten notes re fluorescein spill to brook
9aii	11/28/88 W. Mock handwritten notes re fluorescein spill

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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9a ii	12/7/88 W. Mock to NJDEP "Fluoroscein Contamination Passaic River 11/27-28/88"
9a ii	3/30/93 "NPDES Notes" handwritten entries for specific dates in 1993 noting heavy rainfalls, increased river flow, discolored discharges [fluoroscein], odorous discharges, nitrobenzene odor-water, river back-charging over weir,
9a ii	4/16/87 handwritten notes recording time, contacts/entities attached 4/20/87 notes samples, testing procedures and labs to receive samples, attached 4/20/87 "Fluoroscein Incident"
9a ii	12/7/88 W. Mock to NJDEP "Fluoroscein Contamination Passaic River 11/27-28/88"
9a ii	5/26/89 W. Mock memo to K. Koneval "Storm Water Run-off Diversion" During the last two weeks heavy rains the Passaic River back purged and flooded the plant storm sewer
9b	5/26/89 W. Mock memo to K. Koneval "Storm Water Run-off Diversion" During the last two weeks heavy rains the Passaic River back purged and flooded the plant storm sewer
10	10/12/87 J. Gebrian memo to K. Hansen re "Status of Environmental Situation at Hawthorne"
10	2/6/98 Calendar "Daily Record of Events" Hawthorne PCBs conversation with Dave Hannemann, EPA; [BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint ]
10	7/25/85 In the Matter of United Technologies Corporation Administrative Consent Order [lists all New Jersey properties owned or leased by Inmont, brief description of activities completing ECRA responsibilities for each site]
10	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 173: In addition to being a witness for the prosecution in the Nobel Oil trial, Paul Mock and James Coscia also testified. Coscia, now deceased was a production manager.
10	5/7/86 NJDEP to A. Schneid "Unauthorized Ownership Change and Hazardous Waste Tank Closure, BASF Corporation (formerly Inmont Corporation), Chemicals Division, Hawthorne, Passaic County, EPA ID# NJD002165371" requesting closure plan be submitted
10	8/12/85 R. Blanchfield to A. Schneid "Hawthorne Closure Plan" attaching Consent Agreement and Consent Order - EPA's settlement to the deficiencies of the Hawthorne Closure Plan.
10	1/1/91 R. Trinks to NJDEPE "NJNPDES Permit No. NJ0002453 " responses to excursions noted during 11/30/90 inspection
10	1/13/97 Merck to UTC Per 9/5/96 meeting, "historic fill" discovered while excavating on BASF property will be included in report to NJDEP. UTC to make disposal arrangement for materials loaded into rolloff containers.
10	1/5/93 K. Killeen to NJDEPE "BASF Corporation - Hawthorne Site /NJNPDES Permit No. NJ0002453 " responding to deficiencies in 12/9/92 Inspection Report result from circumstances beyond BASF control, namely that the cessation of operations resulted in the discharge of stormwater alone.
10	10/22/90 A. Gillen memo to U. Soenksen "Hawthorne" recommending removal of PCB contaminated transformer, compliance with discharge permit
10	11/30/90 NJDEP NOV NJNPDES Permit No. NJ0002453 "The facility exceeded the permit final effluent limitation for color 4/90, 5/90 and 6/90.
10	12/11/96 "Preliminary Engineering Report on the Source of Contamination at the South Field Pumping Station Site Wagaraw Road Block 13, Lot 1 Borough of Hawthorne Passaic County, New Jersey" prepared for the Borough of Hawthorne with marginalia
10	12/16 [notes do not have year-only month and day] Handwritten notes "Area 3" sampling procedures to be followed for historic fill on Merck property
10	12/17/93 NJDEP Discharge Surveillance Report Deficiencies
10	12/17/93 NJDEP Discharge Surveillance Report Deficiencies
10	12/2/91 R. Trinks to NJDEPE "NJNPDES Permit No. NJ0002453 Compliance Evaluation Inspection" BASF responses re 10/16/91 Site Inspection and to 11/15/91 letter
10	12/20/93 J. McKeon to P. Rubbe attaching NJDEPE Notice of Violation for water permits excursions. "
10	12/27/93 NJDEPE to BASF "Compliance Evaluation Inspection BASF Corporation - Chemicals Division NJNPDES Permit No. NJ0002453 Class: MIN-IND-DSW Munic./County: Hawthorne Borough, Passaic County"
10	12/28/92 P. Webb to NJDEPE response to NJDEPE 12/14/92 letter clarifying information re noncompliance, request to reconsider parameters of [NJNPDES Permit No. NJ0002453 ]
10	12/8/89 W. Mock memo "Hawthorne Water Pollution Lawsuit"

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10	12/9/92 NJDEPE to BASF Corporation "Compliance Evaluation Inspection BASF Corporation - Hawthorne Site NJPDES No.: NJ0002453, Class: MIN-IND-DSW, Munic/County: Hawthorne Borough, Passaic County"
10	1992 "Chronology - Hawthorne Water Violation" list of excursions and responses
10	2/19/93 J Larry Jameson [BASF Pres Coatings & Colorants Division] to Honorable Scott A. Weiner, NJDEPE, Office of the Commissioner "BASF Corporation/Hawthorne " requesting meeting to resolve the permitting issue that has remained undecided for 6 years [NJPDES Permit No. NJ0002453]
10	4/18/97 Merck to NJDEP "Remedial Action Report for the Off-Site Sediment and Soil Removal Project Former Calgon Corp. Metasol Plant Hawthorne Boro, Passaic County ISRA #89533"
10	5/15/90 W. Mock to R. Trinks "Stream Discharge to Passaic River Special Analytical Work"
10	5/5/97 Boswell McClave Engineering to Stodt & Horan [Borough of Hawthorne attorneys] "potential increased costs in South Field Pumping Station area due to volatile organic chemicals (VOCs) which have migrated from adjacent properties." Affects on sewer systems
10	6/1/90 NJDEP to R. Trinks "Compliance Evaluation Inspection BASF Corporation - Chemicals Division NJPDES Permit No. NJ0002453 Class: MIN-IND-DSW Munic/County: Hawthorne Borough, Passaic County"
10	6/17/96 Four sets of Excel spreadsheets "Summary of Analytical Results"
10	6/24/91 NJDEP to BASF Corporation "Non-Submittal of Discharge Monitoring Report NJPDES Permit No. NJ0002453" NOV failure to submit April 1991 DMR.
10	6/30/93 P. Webb to NJDEP "BASF Corporation – Hawthorne Site NJPDES Permit No. NJ0002453 Case No. 93-6-25-1149-24" confirmation of "verbal notification to the DEPE Hotline on June 25, 1993 of an exceedance of BASF's NJPDES Permit (#0002453) limit for color on June 1, 1993."
10	8/23/89 NJDEP to K. Koneval Corporation "Compliance Evaluation Inspection BASF Corporation - Hawthorne Site NJPDES Permit No. NJ0002453 Class: MIN-IND-DSW Munic/County: Hawthorne Borough, Passaic County" Compliance Evaluation Inspection on 6/14/89 "; attached: 6/14/89 Discharge Surveillance Report
10	9/11/89 R. Trinks to NJDEP "NJPDES Permit No. NJ0002453 BASF Corporation Hawthorne Borough, County of Passaic" plant operations ceased since last permit renewal
10	Various Dates Collection of Sample analyses from several sources re Calgon with marginalia
10	1/26/83 Complaint, Compliance Order, and Notice of Opportunity for Hearing
10	2/24/83 Consent Order and Consent Agreement, UTC/ Inmont Responses
10	9/17/81 Letter to Document Control Officer, Office of Pesticides and Toxic Substances – Confidentiality Requested - re PCB Generation & Control in Pigment manufactured by Inmont Corp. describes the process by which certain pigments are manufactured with PCBs as an unintentional by-product, typically <50ppb. "[page 4] (4) Its presence is almost negligible in the waste effluent."
10	5/16/85 USEPA Region II Docket No. II RCRA-85-0106 [deficiencies/omissions noted on Inmont Closure Plan including information related to wastes]; 12/31/85 NJDEP Notice of Violation and Penalty Settlement Offer [some related to hazardous wastes]; 12/29/85 USEPA Complaint , Compliance Order and Notice of Opportunity for Hearing 2/24/83 USEAP Docket No. II RCRA-83-0106 Consent Agreement & Consent Order 4/9/85 USEPA Complaint , Compliance Order and Notice of Opportunity for Hearing 8/1/85 memo re unannounced NJDEP inspection and citations
10	5/24/91 NJDEP Notice of Violation
10	1/15/87 Draft Arvidson letter to Borough of Hawthorne re 1/14/87 meeting with Borough officials, United Technologies and BASF Corporation to discuss Borough's request that UTC and BC provide financial assistance to construct treatment facility
10	3/25/87 D. Schneider, BASF in-house counsel to NJDEP re objections to " directives" of 9/9/86 & 3/11/87
10	1/23/89 W. Mock memo to D. Webster "PJP Landfill – ref. Praschak to Dis. 10/18/88; Praschak to Dis. 12/20/88" Chart created to respond to NJDEP Request for Information Transporters used, Quantities
10	5/5/92 Mock return 3/26/92 fax from D. Webster select portions of Interrogatories
10	12/29/97 USEPA Region II to Jim Poff In the Matter of BASF Corporation Docket No.: II TSCA-98-0107 with marginalia

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Request No.	Identification and Description of Responsive Document
10	1998 "TSCA Punch list" handwritten notes
10	1998 Handwritten notes background facts and research re BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint
10	2/11/98 "Chronology of Events regarding Management of PCB-Impacted Soil" attached: "Alternate Penalty Assessment Scenarios regarding Management of PCB-Impacted Soil"
10	2/11/98 Calendar "Daily Record of Events" Mtg w/ EPA Edison TSCA PCBs notes, impressions, points presented
10	2/11/98 Dames & Moore Slide Presentation for 2/11/98 meeting with EPA with marginalia
10	2/11/98 Handwritten notes analyzing BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint; additional notes & research
10	2/13/98 Brian Diepeveen e-mail to J. Poff "Hawthorne TSCA Complaint" Reporting results of 2/11/98 meeting with EPA
10	3/10/98 Brian Diepeveen to Waste Management, Inc. "BASF Hawthorne Site – TSCA Penalty"
10	3/19/88 K. Killeen to Dames & Moore claim notice re 12/1/94 Environmental Services and Remediation Agreement, and indemnification clause; in re [BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint
10	3/26/88 Lowenstein Sandler to Stuart Keith, USEPA "BASF Corporation Docket No.: II TSCA-98-0107 " Answer and Request for Hearing filed to preserve client's rights, client prefers the offered alternative of informal resolution, and requests settlement conference; attached: Answer and Request for a Hearing on the Complaint
10	3/28/97 Dames & Moore "Proposed Pre-Demolition Excavation Depths BASF Corporation Hawthorne, New Jersey" showing 3/97 Sample Analyses locations and excavation depths; PCBs in re[BASF Corporation Docket No.: II TSCA-98-0107 12/29/97 Complaint
10	3/5/86 Newspaper Article from "The Record" "DEP traces well contaminants to chemical firms"
10	5/18/98 Dames & Moore fax to Brian Diepeveen 5/18/98 e-mail with PowerPoint Slides for upcoming meeting with EPA on 5/28/98; marginalia
10	6/17/97 IEA of New Jersey (An American Environmental Network Laboratory "AEN Inc.") to Dames & Moore Soil Samples PCBs BASF Waste Characterization
10	6/8/98 Lowenstein Sandler to Stuart Keith, Asst. Regional Counsel, USEPA "BASF Corporation Docket No.: II TSCA-98-0107" BASF voluntary "Site Improvement Project"
10	7/1/94 "The PCB Regulations" 40 C.F.R. Part 761 highlighted
10	7/24/97 Land Disposal Restrictions Notification and Certification Form completed by Brian Diepeveen , Waste Characterization Report 106837
10	7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved, attaching credit application for generator needed for billing purposes
10	8/28/97 B. Diepeveen to USEPA "BASF Hawthorne Site – Follow-up Data for Multi Media Inspection Conducted August 18-21, 1997 [cover letter only]
10	8/4/97 Chemical Waste Management, Inc. CB6240 Waste Profile [waste profile only] PCBs
10	8/4/97 Paul to Brian D. [Brian Diepeveen] 7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved
10	9/10/80 Federal Register Vol. 45, No. 177 "Guidelines for the Assessment of Civil Penalties Under Section 16 of TSCA; PCB Penalty Policy" highlighted copy
10	Undated Newspaper Article from "The Record" "Calgon closing factory Cites DEP rules as basis for move from Hawthorne"
10	1/31/86 "Additional Enforcement Actions Addendum to Response to Question #8 Inmont Corp. – Hawthorne Facility ECRA Case #85563" prepared by Lan Associates
10	1/5/93 K. Killeen to NJDEPE "BASF Corporation - Hawthorne Site /NJPDES Permit No. NJ0002453 " responding to deficiencies in 12/9/92 Inspection Report result from circumstances beyond BASF control, namely that the cessation of operations resulted in the discharge of stormwater alone.
10	10/26/89 O'Brien & Gere fax to BASF Corporation NJDEP 7/11/85 In the Matter of United Technologies Corporation Administrative Consent Order with select phrases/portions underlined
10	11/10/93 NJDEPE to BASF Corporation "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	12/14/92 P. Rubbe to K. Killeen "Hawthorne NJPDES Deficiencies"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
10	12/18/92 P. Rubbe to K. Killeen "Hawthorne" NJDEP contact advised no one assigned to address BASF permit renewal.
10	12/28/92 P. Webb to NJDEPE "BASF Corporation /NJPDES Permit No. NJ0002453 DMR for Period Ending 9/30/92" response to NJDEPE 12/14/92 letter re 9/3/92 TSS non-compliance. "The existing NJPDES permit was written to regulate withdrawal, use, and discharge of noncontact cooling water with an allowance for 'netting out' pre-existing river water contamination." Currently the only discharge is stormwater runoff, as the plant ceased operations in 1986. attached: 12/14/92 NJDEPE to BASF Corp "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453" and attached 12/22/92 E. Madzy to P. Webb e-mail "Hawthorne " with explanation of DMR for period Ending 9/30/92
10	12/9/92 NJDEPE to BASF Corporation "Compliance Evaluation Inspection BASF Corporation - Hawthorne Site NJPDES No.: NJ0002453, Class: MIN-IND-DSW, Munic/County: Hawthorne Borough, Passaic County"
10	2/25/97 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA #85563" Comments re letters of 11/26/96, 12/13/96 and 11/26/96 Cleanup Plan Progress Report"
10	2/27/92 NJDEPE to E. Wood "Inmont Corporation Hawthorne, Passaic County NJPDES Permit No. NJ0002453" denying 4/22/91 request for modification of permit
10	3/16/93 NJDEPE to BASF Corp "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	3/6/97 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Industrial Establishment: Inmont Corporation Location: 150 Wagaraw Road Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Sale of Property & business; stock transfer Remedial Action Workplan dated September 20, 1993 ("Proposed Groundwater Treatment Compliance Monitoring Strategy") and addenda dated October 15, 1993 ("Final Extraction System Studies Report"), March 31, 1995 April 11, 1995 and August 6, 1996 ISRA Case #85563"
10	4/9/93 NJDEPE to BASF Corp "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453 "
10	5/2/95 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563"
10	5/22/92 NJDEPE to BASF Corp "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	5/23/94 NJDEPE to United Technologies Corporation "Inmont Corporation Hawthorne Boro, Passaic County ISRA Case #85563" providing comments on 10/15/93 Final Soils Remediation report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy, 10/15/93 Final Extraction System Studies Report and Progress Reports of 1/15/94 & 4/15/94.
10	5/23/94 NJDEPE to United Technologies Corporation "Inmont Corporation Hawthorne Boro, Passaic County ISRA Case #85563" providing comments on 10/15/93 Final Soils Remediation report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy, 10/15/93 Final Extraction System Studies Report and Progress Reports of 1/15/94 & 4/15/94.
10	5/8/92 L. Mellen [Group Controller] to NJDEPE re 5/5/92 NOV for 11/91 and 2/92 sampling excursions. Current permit issued while plant operational, but production ceased in 1986, and circumstances have changed regarding discharges. Presently only stormwater discharged. Attached: 5/5/92 NJPDES Facility Interim Inspection Report
10	6/12/92 R. Trinks to W. Mock "Water Discharge Sampling at Hawthorne " Per 6/4/92 discussion, water samples to be taken at two locations "to determine if UTC ECRA activities contributed to BASF's permit excursions."
10	6/17/92 K. Killeen to NJDEPE "BASF Corporation - NJPDES Permit No. NJ0002453 " response to 5/22/92 letter re failure to comply within effluent limitations. Plant operations ceased in 1986, currently the only discharge is stormwater runoff.
10	6/18/93 P. Rubbe to P. Webb, J.. Wehman "Hawthorne Permit Termination"
10	6/25/93 NJDEPE to BASF Corporation "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	6/25/93 Phil [Webb] e-mail to P. Rubbe "Hawthorne Permit Violation"

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Request No.	Identification and Description of Responsive Document
10	6/3/93 P. Webb to H. Degen re NOV issued at 6/2/93 Facility Interim Inspection re 3/93 TSS excursion
10	6/3/93 P. Webb to NJDEPE "BASF Corporation - Hawthorne Site NJPDES Permit No. NJ0002453 " response to NOV issued 6/2/93 during NJPDES Facility Interim Inspection
10	7/28/93 NJDEPE to BASF Corporation "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	9/3/93 NJDEPE to BASF Corporation "Violation of Effluent Limits or Parameter Reporting Requirements NJPDES Permit No. NJ0002453"
10	1/15/90 Deposition of Donald Bello in re Paul F. Harding et. al. v. Calgon, et al. Superior Court of New Jersey Law Division – Passaic County Docket No. W-011770-88
10a	1/21/94 Paul Rubbe [BASF Northeast Team Leader Ecology & Safety] to NJDEPE "BASF Response to Hawthorne 12/7/93 Compliance Evaluation" providing additional information re deficiencies noted in 9/27/93 letter re NJPDES permit..
11	5/5/97 to 8/28/97 Photographic Journal "BASF Hawthorne, New Jersey Environmental Oversight and Soil remediation May 5, 1997 – August 28, 1997" removal of concrete slab, sewer lines,
11	11/25/86 NJDEP to UTC re United Technologies Corporation Inmont Corporation - Hawthorne Facility 150 Wagaraw Road, Hawthorne Boro, Passaic County ECRA Case #85563" re sampling Plan, recent spill
11	3/17/92 D. Webster to NJDEPE "Your letter dated January 14, 1992 on Closure Certification for BASF's Hawthorne facility, EPA ID #NJD 002165371, NJ Project No. CP—86-27" acknowledging receipt of 1/14/92 acceptance of closure certifications. Advising that BASF completed ECRA obligations, Negative Declaration received 5/31/90.
11	3/27/92 NJDEPE to D. Webster "Hazardous Waste Container and Tank Storage Area Remediation, BASF Hawthorne Facility, Hawthorne, NJ, EPA ID #NJD 002165371, NJ Project No. CP-86-27"
11	4/23/93 D. Webster to NJDEPE "Hawthorne RCRA Areas"
11	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Sampling Results EPA ID# NJD002165371" sampling procedures, Accutest Laboratories
11	4/18/89 T. Szelest, BASF Environmental Specialist to Passaic County Utilities Authority "BASF Corporation - Hawthorne, NJ Waste Report" forwarding completed Solid Waste Report requested in PCUA's 3/7/89 letter. Attached: completed form
11	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
11	7/18/89 NJDEP to K. Koneval responding to BASF 6/22/89 letter re disposal of 105 cubic yards of Passaic River silt contaminated with small quantities of dioxin. Attached: 7/6/89 NJDEP internal memo "Disposal of Solid Waste at a Hazardous Waste Facility"
11	8/1/86 "Hawthorne closure Plan Summary Sheet – August 1, 1986 150 Wagaraw Road Hawthorne, NJ EPA ID# NJD002165371" "temporary stores hazardous waste in one 3,000 gallon underground tank and a maximum of 60 – 55 gallon drums."
11	8/17/88 O'Brien & Gere to Environmental Services E.I. DuPont forwarding completed Waste Characterization Questionnaire including Accutest Sampling results
11	9/2/88 O'Brien & Gere to K. Koneval enclosing report "Analytical results from the RCRA Drum Storage Pad" performed by Accutest Laboratories
11	9/28/87 J. Gebrian to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Waste Storage Area and Underground Tank"
11	1/14/91 D. Webster to UTC confirming decisions arrived at during a "recent meeting" including responsibilities for: tank removal, PCB impacted soil, storm drainage ditch, etc.
11	1/14/92 NJDEP to D. Webster "S01/S02 Closure Certification for the BASF Corporation, Wagaraw Rd., Hawthorne, Passaic Co., NJ, EPA ID #NJD 002165371, NJ Project No. CP-86/27" responding to BASF 7/31/91 and 10/31/91 submittals and 4/25/88 closure plan approval letter, and accepting the closure certification.
11	1/16/90 K. Koneval to NJDEP "BASF Coatings and Colorants Facility in Hawthorne, New Jersey, Hazardous Waste Facility Annual Report for 1988, EPA ID #NJD 002165371"
11	1/18/88 J. Gebrian to P. Arvidson "Hawthorne, New Jersey " attaching chronology of events to ECRA

**Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
11	1/27/89 O'Brien & Gere fax to K. Koneval partial schematic showing locations of former solvent tanks in vicinity of RCRA storage tank.
11	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility ECRA Case No. 87117" responding to 11/30/89 NJDEP letter (attached)
11	1/7/92 UTC to D. Webster responding to 11/1/91 verbal proposal that UTC will contribute 50% towards additional investigation tasks re RCRA Storage pad and UST.
11	1/8/92 Baker Environmental, Inc. to UTC "Proposal to Investigate Soils in the Former RCRA Storage Areas at BASF's Hawthorne, New Jersey Property"
11	10/13/88 W. Mock to U. Soenksen "Bldg 6a Pigment Contamination/ Storm Sewer 10/10/88" reporting spill
11	10/13/88 W. Mock to Passaic Valley Sewer Commission [PVSC] "Temporary Storm Sewer Diversion 14404910-31058-0141"
11	10/21/96 P. Siegel to B. Diepeveen sample of wording to be considered for Hawthorne project, attached: Section 02080 Remedial Action for Oil Spill Area at UST, attached: Appendix A "Hawthorne, New Jersey Demolition Project"
11	10/22/90 A. Gillen memo to U. Soenksen "Hawthorne" recommending removal of PCB contaminated transformer, compliance with discharge permit
11	10/26/89 K. Koneval DRAFT letter to UTC responding to 9/22/89 UTC letter (attached) re outstanding issues to be resolved. 9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
11	10/31/91 D. Webster to NJDEP "Closure Certification for BASF Corporation Hawthorne, Passaic County EPA ID# NJD002165371" cover letter only of "Owner/Operator Certification" {enclosures not attached}
11	10/9/90 W. Mock memo to R. Trinks "Main Power Transformer Mat PCB Remediation"
11	11/14/91 D. B. Kelly Security Agency Incident Report oil poured into sewer
11	11/14/91 AETC Field Services Shipping/Receiving Form procedures and materials used to clean up 4-5 quarts of motor oil poured into storm drain
11	11/19/91 fax D. B. Kelly to W. Mock of J. Smith [D.B. Kelly] memo to Timothy Hill "BASF –Spill" report on motor oil being poured into "sewer line."
11	11/19/91 L. Paul fax to W. Mock 11/19/91 W. Mock to U. Soenksen "Hawthorne Spill Incident 11/14/91 Ref: NJDEPE Case #91-11-14-1450-28" A D. B. Kelly security guard changed his car oil, then dumped the used motor oil into the storm water catch basin
11	11/6/91 D. Webster memo to U. Soenksen, J. Poff [in-house counsel] "Summary of Meeting with UTC November 1" UTC met with NJDEPE ECRA case manager to discuss contamination
11	12/1/78 A. Kidwell to R. Gasson [Asst. Mgr. Printing Inks] "DCB Handling at Hawthorne"
11	12/17/91 D. Webster to NDEP "Hawthorne Manifest" enclosing requested Hazardous Waste Manifest CWMA 442933 documenting that RCRA tank was cut up and sent offsite.
11	12/4/91 R. Trinks to NJDEP "Spill Incident Report Case #91-11-14-1450-28 BASF Corporation , Hawthorne, New Jersey"
11	1997 Photo Log of water lines cut and capped by contractor; storm sewer connections capped; UST #2 "pulled and destroyed" attached: 1996 "Hawthorne Site – Site Demolition Plan & Contractor Laydown Area"
11	3/6/78 E. Heinz [Inmont Corporate Insurance] to R. Gasson [Hawthorne Plant Mgr.] "Liberty Mutual's Loss Prevention Visit – 2/23/78" attaching 2/27/78 Liberty Mutual to E. Heinz: Visit's purpose to evaluate DCB handling procedures.
11	4/18/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – Sampling Program" cost estimate for sampling at former transformer, RCRA storage tank and pad areas
11	4/19/88 NJDEP Internal memo "Closure of One Hazardous Waste Drum Storage Pad and One Hazardous Underground Storage Tank at BASF Corp. – Inmont, Hawthorne, EPA ID #NJD 002165371" Draft approval mentioned in memo is not attached as stated
11	4/23/90 NJDEP to K. Koneval "Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371"



Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
11	4/7/88 O'Brien & Gere to NJDEP "BASF RCRA Storage Tank Monitoring Wells, Hawthorne, New Jersey Facility"
11	4/8/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation - Inmont, Hawthorne EPA ID# NJD002165371" re hazardous waste storage area and the 3,000 gallon UST
11	5/19/88 O'Brien & Gere to W. Mock "RCRA Closure" providing sampling, analytical and documentation services required for closure of RCRA UST and storage, including correspondence to/from NJDEP 4/25/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation- Inmont Hawthorne EPA ID #NJD 002165371" 4/6/88 O'Brien & Gere to NJDEP "BASF RCRA Storage Tank Monitoring Wells, Hawthorne, New Jersey Facility" 9/28/87 J. Gebrian to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Waste Storage Area and Underground Tank BASF Corporation – Inmont Site, Hawthorne, New Jersey " 7/13/87 D. Webster to J. Gebrian Reply Message attaching 7/8/87 NJDEP to D. Webster "Closure Plan for Hazardous Waste Storage Area and Underground Tank for BASF Corp.– Inmont, Hawthorne, EPA ID #NJD 002165371 "
11	5/21/90 K. Koneval responding to NJDEP 4/23/90 re "Closure Status for the Two RCRA Units at the BASF Hawthorne Facility EPA ID# NJD002165371"
11	5/30/91 D. Webster to NJDEP "Hawthorne BASF RCRA Closure" fax of BASF 6/23/90 response to DEP's request for a plan to delineate and remediate RCRA units.
11	6/16/89 K. Koneval to NJDEP "BASF Corporation - Hawthorne, New Jersey Solid Waste (Riversilt) – Class ID 27"
11	7/17/95 P. Mock to File "Hawthorne – Final Work Scope" Items to be completed based on walk-through; attached: schematic of plant
11	7/18/89 W. Mock memo to K. Koneval "Elimination of Building 10 Transformers Letter W. W. Mock \ K. C. Koneval – 7/1/89"
11	7/24/90 Fred C. Hart Associates, Inc. letter to R. Trinks "ECRA Soil Remediation at the Former Inmont Corporation Hawthorne Facility"
11	7/24/90 R. Trinks to A. Gillen "Ecology Issues at Hawthorne" memo with handwritten revisions
11	7/3/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – RCRA Program" UST removed and transported off-site for disposal. Drum storage pad requires additional cleaning – Inland Pollution Services, Inc. retained
11	7/7/89 W. Mock memo to K. Koneval "PCB Transformer Site Remediation" with attached 6/30/89 Advanced Environmental Technology Corporation (AETC) letter recommending removal & disposal of transformers re PCB contamination
11	8/5/91 D. Webster to NJDEP attaching Owner/ Operator Certification re " closure of hazardous waste facility's apparatus, secondary containment, tanks and associated apparatus..."
11	9/16/88 W. Mock to K. Koneval "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere"
11	9/22/89 UTC responding to K. Koneval 7/13/89 letter disputing items BASF claims are UTC responsibilities re ECRA
11	9/28/87 BASF Corporation to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Storage Area and Underground Tank BASF Corporation - Inmont Site, Hawthorne, New Jersey (EPA ID# NJD00216537"
11	9/29/88 W. Mock to U. Soenksen "Bldg. 6 Pigment Pit Sludge Spill 9/26/88"
11	9/6/91 O'Brien & Gere to D. Webster "BASF Corporation, Hawthorne, New Jersey Facility RCRA Program" Advance Environmental Technology Corporation (AETC) cost estimates for transportation and disposal of drums consistent with previous submissions
11	Undated Handwritten Notes re RCRA/ECRA Issues between BASF & UTC options, positions, attempt to determines responsibilities and rough calculations for cost estimates for individual tasks for tank area, "PCB pad" drum storage pad - list of observations when UST removed intact – solvent odors, staining below tank, contaminants detected under tank – toluene, TPH
11	Undated BASF Corporation Purchase Requisition J36310651 Bid Proposal includes procedures for removing contaminated materials, notifications to government agencies, daily reports to BASF, etc.



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Request No.	Identification and Description of Responsive Document
11	1/18/85 Canonie Engineers Proposal UST Decommissioning and Waste Characterization [includes lab results on samples submitted]
11	1/20/83 NJ Environmental Protection Hazardous Waste Facilities Annual Report 1981
11	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste Generator/Transporter information.
11	5/10/84 Memo "Drum Disposal" Paul Mock and Tom Czajkowski visited Hackensack Meadowlands Development Commission in response to call about abandoned and contaminated drums. Decontaminated drums dumped by New Jersey Carting, paperwork, etc in "accord with Inmont disposal procedures." Recommendation to label drums accordingly.
11	9/17/81 Letter to Document Control Officer, Office of Pesticides & Toxic Substances – Confidentiality Requested - re PCB Generation & Control in Pigment manufactured by Inmont Corp. describes the process by which certain pigments are manufactured with PCBs as an unintentional by-product, typically <50ppb. "[page 4] (4) Its presence is almost negligible in the waste effluent."
11	4/19/83 Environmental Survey of Hawthorne Plant II
11	10/85 Spill Control Plans A revised 10/85 Spill Contingency Plan contains a diagram of the plant designating areas where drums were stored.
11	1974 Spill Control Plan
11	4/19/83 Environmental Survey of Hawthorne Plant II
11	4/19/83 Environmental Survey of Hawthorne Plant II
11	10/89 O'Brien & Gere "ECRA Decommissioning and demolition Report BASF Corporation Inmont Site Hawthorne, NJ BASF Corporation October 1989"
11	6/94 Baker Environmental, Inc. "Attachment Volume 1 of 1 Attachments to June 22, 1994 Response to NJDEPE Letter dated May 23, 1994 United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
11	2/28/90 Cleanup Plan for Inmont Corporation Facility Hawthorne, New Jersey prepared for United Technologies Corporation
11	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
11	1/10/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" waste profile sheets prepare and sent to waste disposal facilities
11	1/5/88 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen "NJDEP Permit" attached: 12/24/87 NJDEP TO J. Gebrian "Response of comments and Issuance of Final Major Modification of NJPDES DSW Permit NJ0002453" re closure of an underground hazardous waste storage tank.
11	10/10/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; contractor has responsibility to arrange for sampling and analysis
11	10/11/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" BASF rejected OHM proposal to recycle wood, and indicated it was be sent to a transfer station, or if found hazardous, to a secure landfill. Bldg 18 filter tank sludge test results not yet available. [results later showed dioxin contamination of Passaic River silt]
11	10/13/88 Handwritten List "Concrete Recycling" from KCK [Discussion with ? Ken Koneval]
11	10/19/88 O'Brien & Gere responding to OHM 9/29/88 letter re Analytical Report for acid brick and determination to classify bricks as hazardous
11	10/21/88 C. R. Evans memo to U. Soenksen "Hawthorne decommissioning Status Update"
11	10/24/88 O'Brien & Gere to OHM requesting cost estimate for removal and disposal of tank adjacent to Bldg. 12 per attached Scope of Work
11	11/22/88 "Phone Conversation with [D.B. Kelley] J.R. Kelley and T. Whie Information discussed with J. Sorena [security guard who poured oil into sewer]"
11	11/29/88 Chemical Waste Management to BASF, Hawthorne, NJ agreeing to accept waste as characterized on Generators Waste Profile Sheet(s) OHM H76513.
11	11/30/88 OHM forwarding to O'Brien & Gere 11/29/88 letter from Chemical Waste Management confirming that their Emelle, AL facility will be able to receive wastes, and confirming that OHM segregated debris, sludge, etc. of pump and filter houses located adjacent to Passaic River
11	11/7/88 W. Mock to Chemical Waste Management verifying his authorization to test acid solids materials on Waste Profile Sheet H76494, which is attached.

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
11	11/9/88 "Job Meeting – 11/9/88 BASF Extra/Underscoped Work" 5. Sewer Cleaning BASF Drawings "were not complete or entirely accurate" "Drum dumping into ink pool As requested, OHM dumped the ink from 34 drums into the storage pool which also contains ink from Bldg. #30 [Warehouse] tanks...."
11	11/9/88 O'Brien & Gere to File "Job Coordination Meeting" page 2, at 6. "OHM its sources of knowledge relative to past contamination of the Passaic River and indicated the following: a. O.H. Materials identified a fish ban in the Passaic River due to a chemical contamination of the river sediment." BASF also requested that OHM provide all public records relative to previous contamination of Passaic River. [results showed dioxin contamination of river silt]
11	11/9/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" page 2, "7. Filter House Material BASF requested the information pertaining to O. H. Materials' decision to test for dioxins. BASF instructed the Contractor to provide all public record information currently existing on the Passaic River contamination with dioxins."
11	12/14/88 O'Brien & Gere to OHM attaching Preliminary Punch Lists of Items to be completed or that have not been satisfactorily completed
11	12/30/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" OHM to continue to remove hazardous debris, meeting scheduled to discuss Bldgs. 17 & 18 filter debris results showed dioxin contamination of river silt
11	2/1/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" status waste streams onsite"
11	2/22/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" materials approved for disposal, or disposed of at various facilities
11	2/22/89 W. Mock Notes on "Job Meeting Agenda" "ThermalKEM PCB soils; ENSCO"
11	6/15/89 Disposal Costs Hazardous & non-hazardous Computer- generated report
11	6/21/88 K. Koneval memo to R. Doerfler, BASF Purchasing "Freon Disposition" attached: W. Mock 6/10/88 memo to K. Koneval "Freon Disposition (R-22-Monochlorodifluoromethane)" and MSDS; attached: undated "Listed Facilities in Northeastern States" schematic with names of waste disposal services and locations; attached: 7/25/88 C.E. Nuti handwritten response to K. Koneval re 6/21/88 W.Mock memo - DOT shipping specifications and codes re (R-22-Monochlorodifluoromethane)" attached: 11/22/88 Straight Bill of Lading; attached: 10/6/88 Rollins Environmental Services (J) Inc fax Waste Data Sheet signed by K. Koneval
11	6/7/88 O'Brien & Gere to File "BASF Inmont Preconstruction Meeting " page 3 #37 "BASF informed the Contractor that Freon 22 is being stored on site. Its final disposition has not been determined."
11	7/12/88 O'Brien & Gere "BASF Inmont Job Coordination Meeting" #4. freon stored at Bldg. 31 has not been removed from the site. BASF will be responsible for the final disposal..."
11	7/12/91 Inland Pollution Services, Inc. Invoice re "Cleaning and Decontamination of RCRA Storage Pad"
11	7/15/88 OHM to O'Brien & Gere enclosing ETC Findlay Laboratory analytical results re DCB
11	7/19/88 C.R. Evans to U. Soenksen "Hawthorne Decommissioning Status Update" "During the removal of this unit [in Bldg. 25], the transformer fell on its side and oil containing 49 ppm PCBs was spilled. OHM personnel immediately cleaned up the spill. This occurred on the waste treatment pad."
11	7/21/88 OHM to W. Mock "Six Electrical Transformers Containing PCB Oil" - dismantling, handling and disposal related procedures
11	7/26/88 B. Handog handwritten to W. Mock "Bulk Asbestos Analysis" none detected by Laboratory Testing Services
11	8/16/88 K. Koneval memo to W. Mock "Disposal of PCB's" attaching EPA list of companies approved for disposal of PCBs
11	8/16/88 O'Brien & Gere memo to File "BASF Inmont Job Coordination Meeting" modifications: OHM to accept responsibility for disposal of building rubble at landfill; BASF decided that trays outside Bldg. 6A to be disposed of as hazardous waste; all PCBs to be removed from plant within 7 days to appropriate site

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
11	8/23/88 R Doerfler Handwritten Notes Omega Chemical in CA will take freon to reprocess "check with Environmental to see if they're legit." AETC waiting to hear from DuPont
11	8/30/88 C. R. Evans to U. Soenksen "Hawthorne decommissioning Status Update" UST removed, samples taken
11	8/9/88 Handwritten Notes #4. PCB –label properly & ship by 8/29/88 also trans [transformers]; 8. "location of PCB's – A.S/G.G. [Al Schneid/Gus Gags] with attached Sign In Sheet, also 8/9/88 Waste Classification Background Meeting
11	8/9/88 O'Brien & Gere to File "BASF Inmont, Waste Classification Meeting" procedures to ensure hazardous materials is classified properly and that the appropriate manifests are prepared, and confirmation sampling conducted and reported, transformer oil [PCB] disposal due date
11	9/12/91 Advanced Environmental Technology Corporation invoice for solvent spill clean up & disposal (manifest NJA1163409) attached: 9/6/91 O'Brien & Gere to D. Webster "...six drums generated during the decommissioning of the drum storage pad,..."
11	9/21/88 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting –9/21/88" freon stored in Bldg 31 to be disposed of by BASF subcontractor; "8. It was identified by the O'Brien & Gere on-site field representative that the ballasts in the fluorescent fixtures is claimed by the manufacturer to contain PCB's. These ballasts will be disposed of as a hazardous waste."
11	9/29/88 OHM to O'Brien & Gere enclosing ETC Findlay analytical report re acid brick; OHM recommends disposal as hazardous waste
11	9/30/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; residual product to be removed prior to demolition; concrete pits contain residual product; contractor has responsibility to arrange for sampling and analysis
11	9/4/87 J. Gebrian memo to T. Hays, W. Mock, U. Soenksen, O'Brien & Gere "Hawthorne " enclosing draft permit for DGW re closure of hazardous waste tank.
11	9/88 Agenda [for BASF Inmont Job Coordination Meeting ] Bldg. 31 freon and T&D for RCRA Tank/Former Hazardous Waste Storage Tank Soil
11	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
11	1/3/89 Hazardous Waste Manifest CWMA 448832 [Transporter - Freehold Cartage, Inc.; Facility - Chemical Waste Management, Inc.] with Generator's Waste Material Profile Sheet OHM H 76494
11	10/25/88 OHM to Solvent Recovery Service of NJ enclosing SRS Hazardous Waste Data Sheet of liquid wastes stream for BASF Corp.
11	10/25/88 OHM to Solvent Recovery Service of NJ enclosing SRS Hazardous Waste Data Sheet of liquid wastes stream fro BASF Corp.
11	10/26/88 OHM to SCA Chemical Services, Inc. enclosing Waste Management, Inc. Generator's Waste Material Profile Sheet for BASF Corp.
11	10/26/88 OHM to SCA Chemical Services, Inc. enclosing Waste Management, Inc. Generator's Waste Material Profile Sheet for BASF Corp.
11	11/29/88 Waste Characterization Form # ST-00002-9896
11	11/29/88 Waste Characterization Form # ST-00002-9897
11	1988 Uniform Hazardous Waste Manifest NJA 0537766; attached: 12/88 Solvent Recovery Service Notification of Shipment of a Hazardous Waste Restricted from Land Disposal
11	1989 Invoices dated 8/8/89, 8/9/89 8/11/89, 11/22/89, 9/21/89 8/31/89 9/18/89 from CWM Chemical Services re disposal of Passaic River sediment
11	1989 Invoices dated 8/8/89, 8/9/89 8/11/89, 11/22/89, 9/21/89 8/31/89 9/18/89 from CWM Chemical Services re disposal of Passaic River sediment
11	2/22/86 Canonie Engineers to W. Mock "Proposal Partial Tank Farm decommissioning API Ink division Hawthorne, New Jersey"
11	4/12/89 K. Koneval to American NuKem enclosing Generator's Waste Material Profile Sheet for River Sediment from Passaic River
11	4/12/89 K. Koneval to CECOS International, Inc. enclosing Generator's Waste Material Profile Sheet for River Sediment from Passaic River

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
11	4/12/89 K. Koneval to Chemical Waste Management, Inc. enclosing Generator's Waste Material Profile Sheet for River Sediment from Passaic River
11	4/12/89 K. Koneval to GSX Services, Inc. enclosing Generator's Waste Material Profile Sheet for River Sediment from Passaic River
11	4/12/89 K. Koneval to Rollins Environmental Services, Inc. enclosing Generator's Waste Material Profile Sheet for River Sediment from Passaic River
11	4/26/89 Chemical Waste Management Generator's Waste Material Profile Sheet H44725
11	4/3/86 Canonie Engineers to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning API, Inc. Division Hawthorne , New Jersey"
11	5/19/86 Canonie Environmental 5/19/86 to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank; attached memos: 4/3/86 to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning; 8/25/88 W. Mock memo to K. Koneval "Removal of Underground Tanks – Tank Farm #2 – Building 4"; 5/27/86 P. Arvidson fax to W. Mock to review Triolo 5/7/86 memo; 5/7/86 Triolo memo to file re "BASF/Inmont, Hawthorne, NJ – Underground Tanks Excavation, Soil Sampling and Observations" ; 5/28/86 P. Arvidson to Fred C. Hart Associates Inc. response to 5/7/86 Triolo memo; 5/1/86 R. Trinks memo to W. Hanzl "Underground Tank Removal Program / Hawthorne"
11	5/19/86 Canonie Environmental 5/19/86 to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank; attached memos: 4/3/86 to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning; 8/25/88 W. Mock memo to K. Koneval "Removal of Underground Tanks – Tank Farm #2 – Building 4"; 5/27/86 P. Arvidson fax to W. Mock to review Triolo 5/7/86 memo; 5/7/86 Triolo memo to file re "BASF/Inmont, Hawthorne, NJ – Underground Tanks Excavation, Soil Sampling and Observations" ; 5/28/86 P. Arvidson to Fred C. Hart Associates Inc. response to 5/7/86 Triolo memo; 5/1/86 R. Trinks memo to W. Hanzl "Underground Tank Removal Program / Hawthorne"
11	5/19/86 Canonie Environmental to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank from tank storage decommissioning; lab work conducted by Kramer Chemical
11	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
11	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
11	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use
11	7/18/86 A. Schneid to Canonie Engineers enclosing trucking slips re removal of liquid wastes to Marisol (Nappi Trucking-hauler) and waste flammable to Delaware Container (Zydinsky Environmental-hauler)
11	7/18/86 A. Schneid to Canonie Engineers enclosing trucking slips re removal of liquid wastes to Marisol (Nappi Trucking=hauler) and waste flammable to Delaware Container (Zydinsky Environmental-hauler)
11	1/23/89 W. Mock memo to D. Webster "PJP Landfill – ref. Praschak to Dis. 10/18/88; Praschak to Dis. 12/20/88" Chart created to respond to NJDEP Request for Information Transporters used, Quantities
11	1/23/89 W. Mock memo to D. Webster "PJP Landfill – ref. Praschak to Dis. 10/18/88; Praschak to Dis. 12/20/88" Chart created to respond to NJDEP Request for Information Transporters used, Quantities
11	12/15/80 Hazardous Waste Compliance Checklist [source unknown] forwarded by D. Kuta 1/19/81
11	1979 and 1980 SCA Chemical Services - Earthline Division Invoices
11	1979 & 1980 Invoices – backup documents for charted information provided to W Mock to forward to D. Webster

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Request No.	Identification and Description of Responsive Document
11	1981 through 1986 NJDEP Hazardous Waste Generator Annual reports
11	3/13/81 P. Mock memo to J. P. Italiano "Spill Plans" reason Hawthorne does not fit classification as "Major Facility,"
11	3/9/81 D. Kuta memo "Hazardous Waste Storage Area – Containment" per attached Federal Register
11	4/1/89 W. Mock memo w/enclosures to D. Webster "High Point Sanitary Landfill – Ref: Letter Hays/ Distribution 3/21/89" Hawthorne employee information; types of waste and waste services; attached: Hazardous Waste Generator Annual Reports 1982 to 1987
11	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
11	4/11/84 P. Mock memo to V. Holmes "Hazardous Wastes"
11	4/23/81 D. Kuta memo "W Operating Records" with attached information specific to Hawthorne Plant, including hazardous and non-hazardous disposal sites and services
11	4/81 Inmont Corporation Standards for Generator/Treater/Storer of Hazardous Wastes Hawthorne Plant
11	4/81 Inmont Corporation Standards for Generator/Treater/Storer of Hazardous Wastes Hawthorne Plant
11	5/4/92 W. Mock fax to D. Webster of UTC 4/1/92 cover letter to UTC memo to file "Cortese – On-Site Interview Conducted at BASF Corporation/Inmont Division – 200 Gregg Street, Lodi, New Jersey on 1/15/92"
11	8/5/85 Blanchfield memo to Schneid attaching 7/23/85 NJDEP acceptance of proposed changes to Part A Application for hazardous waste facility ; drum storage area increase; drum storage pad specifications; storage tank volume corrected; hazardous waste added [chromium, lead]
11	9/26/77 Gasson memo to Snyder "Waste Disposal" Specifies landfills where "regular material" is disposed of; "Liquid waste, Red Label, or contaminated material goes to Scientific Chemical, Newark, New Jersey and is burned."
11	Undated Hazardous Waste Facility Standards Form Revision II 9/6/84 WCH
11	7/31/91 O'Brien & Gere Submission to NJDEP Bureau of Hazardous Waste Engineering
11	10/29/98 Brian Diepeveen to NJDEP "Response to NJDEP August 18, 1998 Comments and Work Scope for Closure of Issues related to Northern Portion of Site (Contract Area) – Former Inmont Facility Hawthorne, Passaic County: ISRA Case No. 85563" responding on behalf of UTC
11	11/4/97 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – April 1997 through September 1997 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
11	12/16/97 Dames & Moore to Brian Diepeveen "Submission of Site Improvement Program and Environmental Results Report regarding BASF Corporation's Hawthorne, New Jersey Facility United Technologies Corporation ISRA Case No. 85563"
11	12/17/97 Brian Diepeveen to UTC "Former UTC Inmont Site, Hawthorne, New Jersey – Environmental Results Report For Site Improvement Program ISRA CASE #85563"
11	2/23/99 Brian Diepeveen to NJDEP " 'Registrations Removed' of Underground Storage Tanks BASF Corporation, Hawthorne, New Jersey Facility" USTs removed from site in 1997, were unregistered and were "removed from service sometime prior to 1973."
11	2/8/99 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563"
11	3/3/99 Brian Diepeveen to NJDEP " Addendum A – Site Improvement Program and Environmental Results Report; Completion of NJDEP-requested Delineation Confirmation Sampling and Recommendation for No Further Action regarding the Northern Portion of BASF Corporation 's Hawthorne, New Jersey Facility; ISRA Case No. 85563" [cover letter only]
11	6/27/97 Brian Diepeveen to Clean Earth of New Castle, Inc. "Soil Profile – BASF Hawthorne Site"
11	6/4/97 Baker Environmental, Inc. fax to Brian Diepeveen information re characterization of soils containing xylene form 10/93 "Final Soil Cleanup Report" and Hazardous Waste Manifest
11	7/14/97 NJDEP to Brian Diepeveen responding to letter re reuse of petroleum hydrocarbon contaminated soil, procedures for out-of-state disposal
11	7/16/96 Echo Waste, Inc. to Brian Diepeveen providing estimates for disposal and transportation of non-hazardous materials

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Request No.	Identification and Description of Responsive Document
11	7/24/97 Land Disposal Restrictions Notification and Certification Form completed by Brian Diepeveen , Waste Characterization Report 106837
11	7/3/97 Brian Diepeveen to NJDEP "Recycling of Petroleum Hydrocarbon Contaminated Soils from: BASF Corporation 150 Wagaraw Road Hawthorne, New Jersey 07506" analytical data and Clean Earth of New Castle, Inc. (CENC, Inc.)
11	7/9/97 Brian Diepeveen to NJDEP "Recycling of Petroleum Hydrocarbon Contaminated Soils from: BASF Corporation 150 Wagaraw Road Hawthorne, New Jersey 07506" enclosing acceptance letter from Clean Earth, Inc. of Delaware
11	8/4/97 Chemical Waste Management, Inc. CB6240 Waste Profile [waste profile only] PCBs
11	8/4/97 Paul to Brian D. [Brian Diepeveen] 7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved
11	9/8/97 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" response to 5/12/96 Cleanup Plan Progress Report, telephone conversation of NJDEP & Baker Environmental, Inc. on 5/12/97 & 8/18/97 and 9/3/97 Site visit.
11	Undated BASF Site Plan "Hawthorne Site Areas of Environmental Concern Figure 1"
11	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
11	7/90 "Specifications for The Removal of Soil at the Inmont Corporation Facility Hawthorne, NJ Addendum 3 Alterations/Additions to the July 1990 Technical Specifications"
11	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
11	11/89 NJDEP to BASF Corporation "BASF Corporation 150 Wagaraw Road Hawthorne Boro, Passaic County ECRA Case: #87117 BASF Decommissioning and demolition Report dated: October 18, 1989" additional information requested before No Further Action proposal can be evaluated "4. provide details ...sludge spill"
11	12/14/90 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" "As a result of 5/23/90 Cleanup Plan Approval case reassigned to Cleanup Oversight Section.
11	12/14/92 NJDEPE to UTC Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 6/26/92 Soil Remediation Summary Report, 7/9/92 letter, 7/10/92 Addendum A to Soil Remediation Summary Report and 8/14/92 Treatability Study Results Report submitted by Baker Environmental, Inc.
11	12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" responding to 11/2/95 and 11/20/95 telephone conversations re 10/25/95 discovery of four buried drums. Spill of 80 gallons of spent acid reported 11/1/95, additional details provided by Baker Environmental, Inc. 11/2/95; attached: 12/4/95 NJDEP to United Technologies Corporation "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" reviewed RARs 3/24/95, 4/11/95, 4/17/95 and 4/26/95 and 3/26/95 " 'Comments to Draft NJPDES DGW Permit' and 3/31/95 'Comments to Draft RAW Addendum' "
11	3/8/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 2/15/91 Cleanup Plan Progress Report submitted by McLaren Hart identifying new Area of Concern near former transformer area.
11	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
11	4/18/97 "Remedial Action Report Off-Site Sediment and Soil Removal Action" prepared for Merck & Co., Inc. for the former Calgon Corp. Metasol Plant prepared by Rust Environment & Infrastructure
11	5/23/90 NJDEP to UTC "Industrial Establishment Inmont Corporation - Hawthorne Facility ("Inmont") Location: 150 Wagaraw Road, Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Transfer of Stock Cleanup Plan Dated: February 28, 1990 ECRA Case #85563" accepting plan with noted conditions.

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Request No.	Identification and Description of Responsive Document
11	5/23/94 Fax of undated NJDEPE 3 page letter to UTC "Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case Number 85563" completed review of 10/15/93 Final Soils Remediation Report, 6/30/93 Pilot Studies Results Report, 9/20/93 proposed Compliance Monitoring Strategy letter, 10/15/93 Final Extraction System Studies Report and Progress Reports dated 1/15/94 & 4/15/94. Conditionally approving Inmont Corporation's proposal for no further action for PCB's Tank Farm No. 2, the transformer area, and the former Bldg. No. 5
11	5/23/94 NJDEPE to UTC "Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case Number 85563" [page missing]
11	6/19/92 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to "reports up to and including 3/20/92 Post-Excavation Sampling and Analysis Plan submitted by Baker Environmental, Inc. "
11	6/5/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 3/15/91 Cleanup Plan Addendum 2 submitted by McLaren Hart "
11	7/13/89 OHM Corporation fax to O'Brien & Gere advising changes needed if > 50 ppm PCBs;; attached: Generator's Waste Material Profile Sheet OHM H76697
11	7/20/89 NJDEP to UTC "Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563 Sampling Plan Dated: March, 1989"
11	8/28/89 W. Mock " 'D' and 'PCB' Shipping Weights" total trucking weights
11	8/30/89 NJDEP to BASF Corporation, Inmont Division "Inspection Results, ECRA Case #87117 BASF Corporation 150 Wagaraw Road Hawthorne Boro, Passaic County" attached: 8/18/89 Inspection Report
11	Undated "Appendices A through G, I Former Inmont Facility Hawthorne, NJ "
11	5/23/94 J. McKeon to J. Wehman "Hawthorne demolition – Budgetary Estimate" attached 5/1/94 Industrial Construction Environmental to J. McKeon "Hawthorne, NJ Plant Demolition Budgetary Cost Estimate ICE Proposal #04-02229-NYB"
11	6/17/94 Environmental Protection Agency 40 CFR Part 61 "Asbestos NESHAP Clarification of Intent"
11	6/7/91 D. Webster to Hawthorne RCRA File "Chronology of Events Associated with the RCRA, ECRA and PCB Issues"
11	9/17/91 D. Webster to T. Charlton "Your Request for Information" 9/6/91 inquiries, including soil excavated from RCRA tank area, and soil pile near Tank Farm #1, soil from RCRA tank area disposed of as hazardous waste
11	9/26/94 J. McKeon to Steve Murray [NOE/E] "Hawthorne Demolition" current rules for asbestos removal
11a	3/17/92 D. Webster to UTC "Baker Engineering's Proposal Investigation dated 1/8/92" requesting Baker be authorized to commence activities describe in their 1/8/92 proposal and also to include PCB analysis in RCRA tank area, and characterization of Tank Farm #2 soil pile.
11a	4/5/91 O'Brien & Gere to D. Webster BASF Corporation Hawthorne, New Jersey Facility – Investigation of RCRA Storage Areas and Transformer Area PCBs presence in transformer area, xylene in UST with marginalia
12	1/13/97 Merck to UTC Per 9/5/96 meeting, "historic fill" discovered while excavating on BASF property will be included in report to NJDEP. UTC to make disposal arrangement for materials loaded into rolloff containers.
12	5/14/96 Rust Environment & Infrastructure Drawing Number 35399-03 "Plan and Sections Excavation Area 1 Sheet 5 excavation of Passaic River sediments
12	5/9/97 Merck to UTC "Soil excavated during field activities" enclosed final report submitted to NJDEP for the work Merck "conducted in the Passaic River and on the land adjacent tour site, formally [formerly] owned by your company."
12	9/2/98 Merck fax to B. Diepeveen of 9/1/98 NJDEP fax to Merck of 8/31/98 "ACO In the Matter of Calgon Corp., Calgon Corp. Hawthorne Boro, Passaic County ISRA #89533 Response to the NJDEP's Comment Letter dated November 17, 1997 and 'Revised Remedial Action Schedule' dated March 13, 1998. 'Annual Groundwater Sampling Report: Results of August 1997 Sampling' dated January 27, 1998 and Addendum dated March 6, 1998. January 14, 1998 Meeting at the DEP"



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Request No.	Identification and Description of Responsive Document
12	1/5/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" reviewed ETC Laboratories' QA/QC plan, dioxin contamination of the Passaic River:
12	10/10/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; contractor has responsibility to arrange for sampling and analysis
12	12/20/88 T. Szelest letter to OHM renewing requests for background information, e.g., ETC Lab information; OHM background documentation of regional studies of dioxin contamination of Passaic River
12	9/30/88 O'Brien & Gere to OHM Scope of Work including responsibility to dispose of wastes at appropriate facilities; residual product to be removed prior to demolition; concrete pits contain residual product; contractor has responsibility to arrange for sampling and analysis
12	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
12	6/12/85 R. Panicucci, Lan Associates to File "Site Meeting 6/4/85"
12	10/23/96 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563 Response to NJDEP Comments Regarding the Remediation of PCB Area Near Building 10' dated January 26, 1996; '4-84 Remedial Action Summary report' dated April 22, 1996 (includes information regarding the discovery of buried drums previously submitted in letters dated December 1, 1995, December 14, 1995 and March 18, 1996."
12	3/6/97 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Industrial Establishment: Inmont Corporation Location: 150 Wagaraw Road Hawthorne Boro, Passaic County Block: 12 Lot: 7 Transaction: Sale of Property & business; stock transfer Remedial Action Workplan dated September 20, 1993 ("Proposed Groundwater Treatment Compliance Monitoring Strategy") and addenda dated October 15, 1993 ("Final Extraction System Studies Report"), March 31, 1995 April 11, 1995 and August 6, 1996 ISRA Case #85563"
12a	2/24/89 K. Koneval to NJDEP enclosing "Waste Classification Request Form" and copies of lab reports. Waste to be classified "homogeneous filter gravel and solidified Passaic River silt material"
12a	3/31/95 Baker Environmental, Inc. to NJDEPE "Comments on Draft RAW Addendum Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	10/19/92 Baker Environmental, Inc. to D. Webster "Request for permission to Remove Portion of Existing Fence United Technologies Corporation – Former Inmont Facility Hawthorne, NJ ECRA No. 85563" as part of groundwater treatment system
12a	5/29/92 "Site History Former Inmont Facility 150 Wagaraw Rd. Hawthorne, New Jersey" prepared for United Technologies Gsvtsvexmsr f} Baker Environmental, Inc.
12a	Undated R. Trinks to D. Webster "Hawthorne Remediation" handwritten memo - Hart appears to be preparing for excavation
12a	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	10/98-6/99 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report BASF Corporation BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Sampling Results EPA ID# NJD002165371" sampling procedures, Accutest Laboratories
12a	3/11/98 Baker Environmental, Inc Submission to BEECRA, NJDEP "Baseline Groundwater Sampling Event Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" cover letter for Final Report Baseline Groundwater Sampling Event Report at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12a	3/7/00 Baker Environmental, Inc Submission to BEECRA, NJDEP "Response to December 8, 1999 NJDEP Letter concerning Area 4/84 Area (prior specific comments in February 25, 1997 NJDEP Letter) BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	3/8/00 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report – July 1999 through December 1999 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"



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12a	4/17/00 Submission to BEECRA, NJDEP "Final Report Eighth Round Quarterly Groundwater Sampling Event First Quarter 2000 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12a	5/1/00 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report at the BASF Corporation Former Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	5/1/2000 Baker Environmental, Inc Submission to BEECRA, NJDEP "Results of Southwestern Sidewall Sample in the 4-84 Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	6/1/89 O'Brien & Gere "Attachment 2 Volume 1 of 1 Analytical Data Package Hazardous Waste Underground Storage Tank BASF Corporation Inmont Site Hawthorne, NJ " Accutest Technical Report submitted as Attachment 2 to 6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
12a	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
12a	7/31/91 O'Brien & Gere Submission to NJDEP "BASF Corporation Hawthorne, NJ Facility EPA ID# NJD002165371" documenting RCRA closure in response to NJDEP 6/4/91 r
12a	8/1/86 "Hawthorne closure Plan Summary Sheet – August 1, 1986 150 Wagaraw Road Hawthorne, NJ EPA ID# NJD002165371" "temporary stores hazardous waste in one 3,000 gallon underground tank and a maximum of 60 – 55 gallon drums."
12a	8/15/88 O'Brien & Gere to W. Mock "BASF Corporation Inmont Site Hawthorne, NJ Permit No. 0002453" NJDEP Monitoring Reports for the two rounds of samples collected
12a	8/17/88 O'Brien & Gere to Environmental Services E.I. DuPont forwarding completed Waste Characterization Questionnaire including Accutest Sampling results
12a	8/5/99 Submission to BEECRA, NJDEP "Final Report Fifth Round Quarterly Groundwater Sampling Event Second Quarter 1999 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12a	9/2/88 O'Brien & Gere to K. Koneval enclosing report "Analytical results from the RCRA Drum Storage Pad" performed by Accutest Laboratories
12a	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
12a	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
12a	1/21/94 Paul Rubbe [BASF Northeast Team Leader Ecology & Safety] to NJDEPE "BASF Response to Hawthorne 12/7/93 Compliance Evaluation" providing additional information re deficiencies noted in 9/27/93 letter re NJPDES permit..
12a	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility ECRA Case No. 87117" responding to 11/30/89 NJDEP letter (attached)
12a	1/7/92 UTC to D. Webster responding to 11/1/91 verbal proposal that UTC will contribute 50% towards additional investigation tasks re RCRA Storage pad and UST.
12a	1/8/92 Baker Environmental, Inc. to UTC "Proposal to Investigate Soils in the Former RCRA Storage Areas at BASF's Hawthorne, New Jersey Property"
12a	10/19/88 ETC Findlay Laboratory Analytical Report including PCBs
12a	10/26/88 O'Brien & Gere to W. Mock "RCRA Closure Plan Analytical Summary" UST, former hazardous waste pad,
12a	10/9/89 Lowenstein Sandler to NJDEP "DGW Closure/Post-Closure NJPDES Permit NJ0002453; BASF Corporation-Chemicals Division: Hawthorne, Passaic County" attached: 8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
12a	11/1/95 B. Diepeveen fax to G. Gagis of Geotrans, Inc. "Mercury and Lead Delineation at BASF/UTC Site"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
12a	11/29/92 GeoTrans, Inc. (Ground Water Specialists) to D. Webster "Request for access to BASF Property, 150 Wagaraw Road, Hawthorne, New Jersey " remedial investigation underway at Calgon Metasol Plant property at 200 Wagaraw Road.
12a	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12a	12/11/96 "Preliminary Engineering Report on the Source of Contamination at the South Field Pumping Station Site Wagaraw Road Block 13, Lot 1 Borough of Hawthorne Passaic County, New Jersey" prepared for the Borough of Hawthorne with marginalia
12a	12/7/89 O'Brien & Gere to Hart Environmental Management, Co. "Inmont Site Hawthorne, New Jersey Facility" "ID-27 Analytical Results for Soils Excavated from the Former RCRA Drum Storage"
12a	2/18/97 O'Brien & Gere to BASF Corporation "BASF P.R. No. J36310651 Environmental Oversight Hawthorne, New Jersey Facility" persons/entities with environmental responsibilities
12a	2/7/92 Baker Environmental, Inc. to D. Webster "Stormwater Drainage Ditch Sampling Former United Technologies/Inmont Corporation Hawthorne, New Jersey Facility" collected sample stormwater drainage ditch 12/12/92; attached AnalytiKem An American NuKEM Company 12/18/91 report
12a	3/17/92 D. Webster to UTC "Baker Engineering's Proposal Investigation dated 1/8/92" requesting Baker be authorized to commence activities describe in their 1/8/92 proposal and also to include PCB analysis in RCRA tank area, and characterization of Tank Farm #2 soil pile.
12a	4/18/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – Sampling Program" cost estimate for sampling at former transformer, RCRA storage tank and pad areas
12a	4/5/91 O'Brien & Gere to D. Webster BASF Corporation Hawthorne, New Jersey Facility – Investigation of RCRA Storage Areas and Transformer Area PCBs presence in transformer area, xylene in UST with marginalia
12a	5/1/97 Dames & Moore Tables Analytical Results
12a	5/15/90 W. Mock to R. Trinks "Stream Discharge to Passaic River Special Analytical Work"
12a	5/19/88 O'Brien & Gere to W. Mock "RCRA Closure" providing sampling, analytical and documentation services required for closure of RCRA UST and storage, including correspondence to/from NJDEP 4/25/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation- Inmont Hawthorne EPA ID #NJD 002165371" 4/6/88 O'Brien & Gere to NJDEP "BASF RCRA Storage Tank Monitoring Wells, Hawthorne, New Jersey Facility" 9/28/87 J. Gebrian to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Waste Storage Area and Underground Tank BASF Corporation – Inmont Site, Hawthorne, New Jersey " 7/13/87 D. Webster to J. Gebrian Reply Message attaching 7/8/87 NJDEP to D. Webster "Closure Plan for Hazardous Waste Storage Area and Underground Tank for BASF Corp.– Inmont, Hawthorne, EPA ID #NJD 002165371 "
12a	5/6/91 D. Webster to U. Soenksen, R. Trinks "Hawthorne Remediation" UTC's contractor, ACES commenced soil remediation
12a	6/15/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Storage Facility Sampling" notification of intention to collect soil samples. Attached: 4/25/88 NJDEP to J. Gebrian "Revised Closure Plan Approval, BASF Corporation- Inmont Hawthorne EPA ID #NJD 002165371" in which prior notification is required
12a	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
12a	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
12a	6/22/89 Envirotech Research, Inc. to O'Brien & Gere "Hazardous Waste Characteristics Analysis"
12a	6/24/94 EPC Technologies, Inc. "Asbestos Air Monitoring Report BASF Corporation Former Inmont Facility Hawthorne, New Jersey" Results: "
12a	6/3/96 Merck to B. Diepeveen enclosing proposed access agreement & plot plan [neither attached] and scope of work re excavation of Passaic River sediment, which have shown elevated levels of lead and mercury.

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
12a	6/4/87 K. Hillig [BASF] to J. Gebrian, H. Hintz, M. Mock [W. Mock] "Hawthorne - Outfall Results" and 5/8/87 Accutest Laboratories Priority Pollutant Report
12a	7/10/95 B. Diepeveen to K. Killeen "Site Access to Merck - Hawthorne Site" attaching Merck's request to delineate soil contamination along property line.; attached: 6/29/95 Merck to B. Diepeveen "Access to Hawthorne site for sampling" ; attached grouping: 1) Fred C. Hart Associates, Inc. "Soil Boring and Soil Sampling Locations; 2) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 3) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 4) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant" locations of perimeter borings; 5) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"
12a	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attached: Townley Research and Consulting, Inc. sampling analysis; attached: O'Brien & Gere log sheet noting PCB Sample locations and readings; attached: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attached: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
12a	7/25/90 R. Trinks memo to J. Poff, D. Webster "Ecology Issues at Hawthorne" Hart Clean-up Plan doesn't address "area south of Building 10. PCBs have been found outside the fence..."
12a	7/3/91 O'Brien & Gere to D. Webster "BASF Corporation - Hawthorne, New Jersey Facility – RCRA Program" UST removed and transported off-site for disposal. Drum storage pad requires additional cleaning – Inland Pollution Services, Inc. retained
12a	7/31/91 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility - EPA ID #NJD 002165371" In response to NJDEP's 3/28/91 letter re Closure Plan Certification S01 – Hazardous Waste Container Storage Area
12a	8/26/92 D. Webster to Hawthorne File "Phone Conversation with Troy Charlton [UTC] – 8/25/92" UTC status meeting with NJDEP
12a	9/15/92 D. Webster to R. Trinks, W. Mock "Hawthorne Status Report" attaching 9/15/92 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – August 1992 BASF Corporation (Former Inmont Corporation) Facility – Hawthorne Borough, Passaic County, New Jersey – ECRA Case #85563"
12a	9/2/88 O'Brien & Gere to K. Koneval "BASF Corporation, Inmont Site Hawthorne, New Jersey RCRA Storage Pad Data" Accutest "Analytical results form the RCRA Drum Storage Pad "
12a	9/28/87 BASF Corporation to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Storage Area and Underground Tank BASF Corporation - Inmont Site, Hawthorne, New Jersey (EPA ID# NJD00216537"
12a	Undated Hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Bldg. 10; Storage Pad "; attached: 6/22/89 Envirotech Research, Inc report attached
12a	Various Dates – Collection of Sample analyses from several sources re Calgon with marginalia
12a	10/93 Baker Environmental, Inc. "Final Report Extraction System Studies Results for Aquifer Restoration at the Former Inmont Facility Hawthorne, New Jersey" prepared for United Technologies Corporation
12a	10/93 Baker Environmental, Inc. "Final Report Final Soil Cleanup Report United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12a	11/25/98 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – October 1997 through September 1998 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	11/4/98 Baker Environmental, Inc. to NJDEP "Hawthorne MUA Dewatering Activities Impact Monitoring Program Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12a	11/97 Baker Environmental, Inc. "4-84 Remedial Action Area Backfill United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12a	11/98 Submission to BEECRA, NJDEP "Final Report Quarterly Groundwater Sampling Event Second Quarter 1998 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Volume I" prepared by Baker Environmental, Inc

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Request No.	Identification and Description of Responsive Document
12a	12/18/98 Submission to BEECRA, NJDEP "Final Report Second Round Quarterly Groundwater Sampling Event Third Quarter 1998 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12a	1988 Monitoring Report – Transmittal Sheet BASF Corporation –Chemicals Division(Formerly Inmont Division)
12a	3/11/98 Baker Environmental, Inc. to NJDEP "Response to NJDEP's letter of February 20, 1998 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12a	3/24/95 Baker Environmental, Inc. "Summary of PCB Area Remedial Action Former Inmont Corporation Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 585563"
12a	4/30/96 Baker Environmental, Inc. to NJDEP "Request for Permission to Discharge Development Water into Well IW1-92 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12a	4/96 Baker Environmental, Inc. "4-84 Remedial Action Area Summary United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12a	6/93 Baker Environmental, Inc. "Specifications Backfilling Design United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ECRA Case No. 85563
12a	6/94 Baker Environmental, Inc. "Attachment Volume 1 of 1 Attachments to June 22, 1994 Response to NJDEPE Letter dated May 23, 1994 United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12a	7/94 "(Volume II of III) New Jersey Pollutant Discharge Elimination System Discharge to Groundwater Permit Application United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12a	7/94 Baker Environmental, Inc. "Volume II of II Appendix A Water Allocation Permit Application United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12a	7/99 Submission to BEECRA, NJDEP "Final Report Fourth Round Quarterly Groundwater Sampling Event First Quarter 1999 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Volume I of IV" prepared by Baker Environmental, Inc
12a	1/10/89 O'Brien & Gere to File "BASF Inmont Job Coordination Meeting" waste profile sheets prepare and sent to waste disposal facilities
12a	12/1/88 T. Szelest to OHM requesting additional background information re ETC Findlay Laboratory results; attached : ETC Lab report dioxin
12a	12/7/89 O'Brien & Gere to Hart Environmental Management Co. Envirotech Research Inc. 6/22/89 analytical results Soils excavated from former RCRA Drum Storage (PCBs)
12a	3/20/89 W. Mock to G. Gaggis, H. Hintz, K. Koneval, U. Soenksen, T. Szelest "RCRA Development Well Water" attached : 1/23/89 Laboratory Resources Inc. sampling analysis 3/15/89 W. Mock to PVSC Agreeing to PVSC Rules & Regs 3/1/89 letter "Discharge of Liquid Waste" 2/10/89 W. Mock to PVSC re Discharge of Monitoring Well Water to PVSC 1/3/89 W. Mock to PVSC requesting permission to discharge 1500 gallons of monitoring well and cleaning water to PVSC and attaching 8/17/88 O'Brien & Gere Wastes Characterization Results sent to DuPont 3/13/89 PVSC Rules & Regulations Concerning Discharges to the PVSC Treatment Works
12a	4/18/89 AETC to W. Mock enclosing analysis of 6 soil samples sent to Townly [Townley] re PCB
12a	4/27/89 Handwritten W. Mock notes re PCB levels K. Hillig quotes re Townly readings; second sheet records PCB readings
12a	7/15/88 OHM to O'Brien & Gere enclosing ETC Findlay Laboratory analytical results re DCB

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
12a	7/17/87 W. Mock to O'Brien & Gere enclosing RCRA Closure Plan; attached: 7/13/87 D. Webster fax to J. Gebrian of 7/8/87 NJDEP review of Closure Plan; attached: 9/3/86 handwritten Sign In Sheet for Hawthorne RCRA Closure Meeting with BASF Inmont and NJDEP personnel; attached: 8/19/86 D. Webster letter to NJDEP outlining reasons that BASF believes groundwater monitoring for the underground hazardous waste storage tank is not warranted; attached: 8/11/86 D. Webster to NJDEP enclosing the Alternative Information Statement re notification for changing the facility's name, Closure Plan including provisions for the underground hazardous waste storage tank and drum storage area. ]
12a	7/19/88 C.R. Evans to U. Soenksen "Hawthorne Decommissioning Status Update" "During the removal of this unit [in Bldg. 25], the transformer fell on its side and oil containing 49 ppm PCBs was spilled. OHM personnel immediately cleaned up the spill. This occurred on the waste treatment pad."
12a	7/26/88 B. Handog handwritten to W. Mock "Bulk Asbestos Analysis" none detected by Laboratory Testing Services
12a	8/16/88 K. Koneval memo to W. Mock "Disposal of PCB's" attaching EPA list of companies approved for disposal of PCBs
12a	9/29/88 OHM to O'Brien & Gere enclosing ETC Findlay analytical report re acid brick; OHM recommends disposal as hazardous waste
12a	12/16/97 Dames & Moore to Brian Diepeveen "Submission of Site Improvement Program and Environmental Results Report regarding BASF Corporation's Hawthorne, New Jersey Facility United Technologies Corporation ISRA Case No. 85563"
12a	2/2/99 Dames & Moore to NJDEP "Scope of Work for remediation of PCB-Impacted Soil at Location PR-14; regarding Site Improvement Program at BASF Corporation's Hawthorne, New Jersey Facility (ISRA Case No. 85563)"
12a	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Base Neutral Compounds detected in Soil beneath Proposed Demolition Contract Area"
12a	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Lead & PCBs detected in Soil beneath Proposed Demolition Contract Area"
12a	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Volatile Organic Compounds detected in Soil beneath Proposed Demolition Contract Area"
12a	5/14/97 Dames & Moore to Brian Diepeveen "Summary of Analytical Results Greater than Most Stringent NJDEP Soil Cleanup Criteria Beneath Proposed Demolition Contract Area"
12a	6/17/97 IEA of New Jersey (An American Environmental Network Laboratory "AEN Inc.") to Dames & Moore Soil Samples PCBs BASF Waste Characterization
12a	6/27/97 Brian Diepeveen to Clean Earth of New Castle, Inc. "Soil Profile – BASF Hawthorne Site"
12a	7/29/97 EQ- The Environmental Quality Company to Dames & Moore advising that approval for TSCA waste from BASF was approved, attaching credit application for generator needed for billing purposes
12a	7/3/96 Dames & Moore to Brian Diepeveen "results of May 1996 Soil Investigation at BASF Corporation's Hawthorne, NJ Facility"
12a	7/3/97 Brian Diepeveen to NJDEP "Recycling of Petroleum Hydrocarbon Contaminated Soils from: BASF Corporation 150 Wagaraw Road Hawthorne, New Jersey 07506" analytical data and Clean Earth of New Castle, Inc. (CENC, Inc.)
12a	8/19/96 Brian Diepeveen to UTC "BASF Corporation /Hawthorne, NJ Results of May, 1996 Soil Investigation"
12a	9/8/97 NJDEP to United Technologies Corporation "Admin istrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563" response to 5/12/96 Cleanup Plan Progress Report, telephone conversation of NJDEP & Baker Environmental, Inc. on 5/12/97 & 8/18/97 and 9/3/97 Site visit.
12a	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
12a	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Sampling Results EPA ID #NJD 002165371" Results from RCRA Soil Sampling at Inmont Site

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Request No.	Identification and Description of Responsive Document
12a	12/82 "Preliminary Evaluation of Groundwater Conditions at Inmont Corporation's Plant" December 1982 prepared by Geraghty & Miller, Inc.
12a	2/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12a	3/16/92 Baker Environmental, Inc. Addendum No. 1 Municipal Well and Treated Effluent Sampling and Analysis 1991 SAGS Report for the Former UTC-Inmont Facility in Hawthorne, NJ" prepared for UTC and NJDEPE
12a	3/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12a	3/92 Baker Environmental, Inc. Results from Semi-Annual Groundwater Sampling Program
12a	4/92 "Final Bench Scale PACT System Treatability Testing Report for the Treatment of Groundwater from the United Technologies Corporation / Inmont Corporation Hawthorne, NJ Facility for Baker Environmental, Inc." prepared by Zimpro Passavant Environmental Services, Inc.
12a	5/21/90 "SSPA II Cleanup Plan for Former Inmont Corporation Facility Hawthorne, NJ ECRA Case No. 85563" prepared by Fred C. Hart Associates, Inc.
12a	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
12a	5/92 Addendum to the Final Bench Scale PACT System Treatability Testing Report for the Treatment of Groundwater from the United Technologies Corporation / Inmont Corporation Hawthorne, NJ Facility for Baker Environmental, Inc." prepared by Zimpro Passavant Environmental Services, Inc.
12a	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Closure Summary EPA ID #NJD 002165371" RCRA Closure Report
12a	6/10/91 McLaren Hart to UTC enclosing 6/7/91 Summary Report re sampling of three Hawthorne Municipal Wells on 4/25/91.
12a	7/28/87 Warren Goldberg Berman & Lubitz to UTC enclosing 2/20/85 "Malcolm Pirnie Potential Hazardous Waste Site Preliminary Assessment Hawthorne Municipal Wells "
12a	7/90 "Specifications for The Removal of Soil at the Inmont Corporation Facility Hawthorne, NJ" prepared for United Technologies Corporation prepared by Fred C. Hart Associates, Inc.
12a	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
12a	1/10/95 Baker Environmental, Inc. to NJDEP "PCB Sample PTP-7-BS Remediation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" enclosing 3 photos and map
12a	1/13/95 Baker Environmental, Inc. to NJDEP "Revised Schedule for PCB Sample PTP-7-BS Remediation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	1/17/95 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – October through December 1994 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	10/20/89 NJDEP to UTC "Inmont Corporation - Hawthorne Facility Hawthorne Borough, Passaic County, New Jersey ECRA Case #85563 Supplemental Sampling Plan Addendum Dated: August 25, 1989" approved with noted conditions
12a	10/20/89 NJDEP to UTC "Inmont Corporation - Hawthorne Facility Hawthorne Borough, Passaic County, New Jersey ECRA Case #85563 Supplemental Sampling Plan Addendum Dated: August 25, 1989" approved with noted conditions
12a	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
12a	11/26/96 Baker Environmental, Inc. to NJDEP Cleanup Plan Progress Report – January through September 1996 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"

**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
12a	11/26/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments on Remediation of PCB Area Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached: 1/26/96 Baker Environmental, Inc. to NJDEP "NJDEP Comments on Remediation of PCB Area Near Building 10 Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12a	12/13/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments to 4-84 Remedial Action Area Summary Report Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	12/14/95 Baker Environmental, Inc. to NJDEP "Response to NJDEP's letter of December 4, 1995 Unanticipated Drums Discovered in the 4-84 Remedial Action Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 NJDEP Emergency Action Line Case No. 95-10-25-1404-48"
12a	12/29/94 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case # 85563" Comments on letters dated 6/22/94 and 9/16/94
12a	2/27/95 Baker Environmental, Inc. to NJDEP "Request for Extension to NJDEP Draft RAW Addendum Response United Technologies Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached: 1/16/95 Baker Environmental, Inc. to NJDEP "Response to NJDEP Request for Additional Groundwater monitoring United Technologies Corporation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" re groundwater contaminants discovered at Calgon site. attached: 11/2/94 Baker Environmental, Inc. to NJDEP "Schedule for Remediation of Sample Location PYP-7-BS in PCB Transformer Area United Technologies Corporation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	3/24/94 Baker Environmental, Inc. to UTC "Methodology Utilized to Determine Maximum and Average Groundwater Contaminant Concentrations UTC-Hawthorne, New Jersey Facility" with attached spreadsheets
12a	3/24/95 Baker Environmental, Inc. to NJDEP "Summary of PCB Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached summary of analytical data
12a	3/3/95 Baker Environmental, Inc. to NJDEP "Proposed Hawthorne MUA dewatering Activities Impact Monitoring Program Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	3/6/95 Baker Environmental, Inc. to NJDEP "Comments to Draft NJPDES DGW Permit Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	3/8/91 NJDEPE to UTC "Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 2/15/91 Cleanup Plan Progress Report submitted by McLaren Hart identifying new Area of Concern near former transformer area.
12a	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12a	4/17/95 Baker Environmental, Inc. to NJDEP Cleanup Plan Progress Report – January through March 1995 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	4/18/97 "Remedial Action Report Off-Site Sediment and Soil Removal Action" prepared for Merck & Co., Inc. for the former Calgon Corp. Metasol Plant prepared by Rust Environment & Infrastructure
12a	4/26/95 Baker Environmental, Inc. to NJDEP April 4, 1995 PCB Transformer Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12a	5/11/95 Baker Environmental, Inc. to NJDEP "Continued Delineation of Area 4-84 Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"



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Request No.	Identification and Description of Responsive Document
12a	5/16/94 Baker Environmental, Inc. to UTC "Revised Maximum Groundwater Contaminant Concentrations UTC-Hawthorne, New Jersey Facility" with attached spreadsheet
12a	5/2/95 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563"
12a	5/9/97 Merck to UTC "Soil excavated during field activities" enclosed final report submitted to NJDEP for the work Merck "conducted in the Passaic River and on the land adjacent tour site, formally [formerly] owned by your company."
12a	6/22/94 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE letter dated May 23, 1994 United Technologies Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" [cover letter only]
12a	7/13/89 OHM Corporation fax to O'Brien & Gere advising changes needed if > 50 ppm PCBs;; attached: Generator's Waste Material Profile Sheet OHM H76697
12a	7/14/94 Baker Environmental, Inc. to NJDEP Cleanup Plan Progress Report – April through June 1994 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	7/14/95 Baker Environmental, Inc. to NJDEP Cleanup Plan Progress Report – April through June 1995 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	7/17/96 Baker Environmental, Inc. fax to B. Diepeveen of 7/2/96 fax to NJDEP attaching Agenda for DGW/RAW meeting with suggested date of 7/16/96 attaching 7/11/96 Baker Environmental, Inc. fax to NJDEP of Site Well Summary
12a	9/16/94 Baker Environmental, Inc. to NJDEP "Request for NJPDES DGW Permit Waiver for Step Tests BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12a	9/29/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Hawthorne, New Jersey – ECRA Case #87117" response to 8/30/89 letter of 8/18/89 site inspection varnish seep
12a	Undated "Appendices A through G, I Former Inmont Facility Hawthorne, NJ "
12a	1/14/91 D. Webster to UTC "Follow-up From Meeting on January 10, 1991" relating to "Fuel Tank Removal," "PCB Impacted Soil," "Stormwater Drainage Ditch"
12a	10/11/91 Baker Environmental, Inc. to D. Webster "NJPDES Permit Application Former Inmont Corporation Facility, Hawthorne, NJ" for BASF review and endorsement
12a	12/2/87 Fred C. Hart Associates, Inc. to E. Fox, NJDEP Case Mgr. Enclosing "data summary from the sampling of existing groundwater monitoring wells "
12a	12/30/88 T. Hays [BASF in-house counsel] to Whilden Parker, Esq., UTC "UTC Hawthorne ECRA Comments" As agreed at meeting with UTC, Fred C. Hart Associates, Inc. and BASF, BASF's comments on draft "ECRA Samplings Plan Results.
12a	2/13/87 Fred C. Hart Associates, Inc. to Keith Frye [Dir. Environmental Affairs] "Addendums to ECRA submittal for Hawthorne Facility" enclosing NJDEP's letter of deficiency
12a	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
12a	5/21/90 Fred C. Hart Associates, Inc. to NJDEP "Inmont Corporation Hawthorne Facility 150 Wagaraw Road, Hawthorne, NJ ECRA Case No. 85563" reports not enclosed as per cover letter. Response for explanation of high readings on select samples
12a	6/28/91 McLaren Hart to D. Webster "Former Inmont Facility, Hawthorne, NJ" attached: 6/6/91 McLaren Hart to NJDEP "Request for Freshwater Wetlands Permit, Statewide General Permit Number 4." Attachment A "Project Description"
12a	6/7/91 D. Webster to Hawthorne RCRA File "Chronology of Events Associated with the RCRA, ECRA and PCB Issues"
12b	2/24/89 K. Koneval to NJDEP enclosing "Waste Classification Request Form" and copies of lab reports. Waste to be classified "homogeneous filter gravel and solidified Passaic River silt material"
12b	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at pages 161-165: Exhibit 12 does not recall pumping tests or results conducted in 1965
12b	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, New Jersey RCRA Sampling Results EPA ID# NJD002165371" sampling procedures, Accutest Laboratories



## SOURCE OF INFORMATION

Request No.	Identification and Description of Responsive Document
12b	3/00 Submission to BEECRA, NJDEP "Final Report Seventh Round Quarterly Groundwater Sampling Event Fourth Quarter 1999 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12b	3/11/98 Baker Environmental, Inc Submission to BEECRA, NJDEP "Baseline Groundwater Sampling Event Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 " cover letter for " Final Report Baseline Groundwater Sampling Event Report at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12b	3/8/00 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report – July 1999 through December 1999 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	4/17/00 Submission to BEECRA, NJDEP "Final Report Eighth Round Quarterly Groundwater Sampling Event First Quarter 2000 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc.
12b	4/3/86 A. Schneid to NJDEP "Hazardous Waste Tank Closure"
12b	5/1/00 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report at the BASF Corporation Former Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	5/1/2000 Baker Environmental, Inc Submission to BEECRA, NJDEP "Results of Southwestern Sidewall Sample in the 4-84 Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	6/1/89 O'Brien & Gere "Attachment 2 Volume 1 of 1 Analytical Data Package Hazardous Waste Underground Storage Tank BASF Corporation Inmont Site Hawthorne, NJ " Accutest Technical Report submitted as Attachment 2 to 6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
12b	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation Inmont Site Hawthorne, NJ RCRA Closure Summary Report EPA ID# NJD002165371"
12b	7/20/99 Baker Environmental, Inc Submission to BEECRA, NJDEP "Cleanup Plan Progress Report October 1998-June 1999 BASF Corporation BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	7/31/91 O'Brien & Gere Submission to NJDEP "BASF Corporation Hawthorne, NJ Facility EPA ID# NJD002165371" documenting RCRA closure in response to NJDEP 6/4/91 r
12b	8/17/88 O'Brien & Gere to Environmental Services E.I. DuPont forwarding completed Waste Characterization Questionnaire including Accutest Sampling results
12b	8/5/99 Submission to BEECRA, NJDEP "Final Report Fifth Round Quarterly Groundwater Sampling Event Second Quarter 1999 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12b	9/2/88 O'Brien & Gere to K. Koneval enclosing report "Analytical results from the RCRA Drum Storage Pad" performed by Accutest Laboratories
12b	Undated D. Webster to Phil [Phil Webb] excerpt from O'Brien & Gere report chart "PCB Analytical Summary" explanation for the 56 ppm reading in soil near RCRA pad
12b	1/13/89 T. Szelest to NJDEP "1989-90 New Jersey Pollutant Discharge Elimination System (NJPDES) Permit Fees"
12b	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
12b	1/14/94 J. McKeon to NJDEPE "UTC Correspondence on Xylene Contamination Discovered in the Vicinity of the PCB Transformer Area, Former UTC Site Inmont Corporation, Hawthorne Borough, Passaic County ECRA Case # 85563"
12b	1/29/90 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility ECRA Case No. 87117" responding to 11/30/89 NJDEP letter (attached)
12b	10/19/88 ETC Findlay Laboratory Analytical Report including PCBs
12b	10/26/88 O'Brien & Gere to W. Mock "RCRA Closure Plan Analytical Summary" UST, former hazardous waste pad,

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests

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Request No.	Identification and Description of Responsive Document
12b	10/3/89 G. Gaggis to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report for August 1989
12b	10/31/89 G. Gaggis to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report for September 1989 (cover letter only) attached: 9/26/89 G. Gaggis to NJDEP "Flow Measurement NJPDES Permit #NJ0002453"
12b	10/9/89 Lowenstein Sandler to NJDEP "DGW Closure/Post-Closure NJPDES Permit NJ0002453; BASF Corporation-Chemicals Division: Hawthorne, Passaic County" attached: 8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
12b	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12b	12/11/96 "Preliminary Engineering Report on the Source of Contamination at the South Field Pumping Station Site Wagaraw Road Block 13, Lot 1 Borough of Hawthorne Passaic County, New Jersey" prepared for the Borough of Hawthorne with marginalia
12b	12/7/89 O'Brien & Gere to Hart Environmental Management, Co. "Inmont Site Hawthorne, New Jersey Facility" "ID-27 Analytical Results for Soils Excavated from the Former RCRA Drum Storage"
12b	2/25/93 P. Webb [Site Manager] to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report for January 1993
12b	2/7/92 Baker Environmental, Inc. to D. Webster "Stormwater Drainage Ditch Sampling Former United Technologies/Inmont Corporation Hawthorne, New Jersey Facility" collected sample stormwater drainage ditch 12/12/92; attached AnalytiKem An American NUKEM Company 12/18/91 report
12b	3/17/87 W. Mock to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report February 1987 "...no longer taking water from the Passaic River...."
12b	3/7/89 K. Koneval to UTC: as requested by Hart Associates enclosing RCRA closure documents – 9/28/87 Amendment #1 – Closure Plan for Hazardous Waste Storage Area and UST submittal to NJDEP ; 11/9/87 Amended Closure Plan submittal to NJDEP; and 4/25/88 Revised Closure Plan Approval issued by NJDEP
12b	4/30/87 W. Mock to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report March 1987 "...no longer taking water from the Passaic River...."
12b	5/1/97 Dames & Moore Tables Analytical Results
12b	5/15/90 W. Mock to R. Trinks "Stream Discharge to Passaic River Special Analytical Work"
12b	5/29/87 W. Mock to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report April 1987 "
12b	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
12b	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
12b	6/17/96 4 sets of Excel spreadsheets "Summary of Analytical Results"
12b	6/22/89 Envirotech Research, Inc. to O'Brien & Gere "Hazardous Waste Characteristics Analysis"
12b	6/24/94 EPC Technologies, Inc. "Asbestos Air Monitoring Report BASF Corporation Former Inmont Facility Hawthorne, New Jersey" Results: "
12b	6/3/87 Harold Hintz, Jr. [BASF Mgr. Environmental Affairs] to NJDEP BASF Corporation unable to determine source of " 'discharge of unknown chemicals in unknown amounts' reported ...April 20, 1987 letter."
12b	6/3/87 W. Mock to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report May 1987
12b	6/4/87 K. Hillig [BASF] to J. Gebrian, H. Hintz, M. Mock [W. Mock] "Hawthorne - Outfall Results" and 5/8/87 Accutest Laboratories Priority Pollutant Report
12b	6/4/87 K. Hillig to J. Gebrian, H. Hintz, M. Mock [W. Mock] "Hawthorne – Outfall Results"

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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
12b	7/10/95 B. Diepeveen to K. Killeen "Site Access to Merck - Hawthorne Site" attaching Merck's request to delineate soil contamination along property line.; attached: 6/29/95 Merck to B. Diepeveen "Access to Hawthorne site for sampling" ; attached grouping: 1) Fred C. Hart Associates, Inc. "Soil Boring and Soil Sampling Locations; 2) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 3) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"; 4) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant" locations of perimeter borings; 5) Geotrans, Inc. "Merck & Co., Inc.'s Former Calgon Corporation Metasol Plant"
12b	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attached: Townley Research and Consulting, Inc. sampling analysis; attached: O'Brien & Gere log sheet noting PCB Sample locations and readings; attached: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attached: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
12b	7/31/89 G. Gaggis to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report June 1989
12b	7/31/91 O'Brien & Gere to NJDEP "BASF Corporation Hawthorne, New Jersey Facility - EPA ID #NJD 002165371" In response to NJDEP's 3/28/91 letter re Closure Plan Certification S01 – Hazardous Waste Container Storage Area
12b	8/10/89 G. Gaggis to NJDEP "NJPDES Report Permit #NJ0002453" DMR Report July 1989
12b	8/28/87 W. Mock to NJDEP "NJPDES Report Permit # NJ0002453" DMR Report July 1987 "Discharge from this site to the Passaic River is limited to storm water run off."
12b	8/28/89 G. Gaggis to Laboratory Resources, Inc. "Results of 1989 National Discharge Monitoring Report Quality Assurance Program"
12b	9/15/92 D. Webster to R. Trinks, W. Mock "Hawthorne Status Report" attaching 9/15/92 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – August 1992 BASF Corporation (Former Inmont Corporation) Facility – Hawthorne Borough, Passaic County, New Jersey – ECRA Case #85563"
12b	9/2/88 O'Brien & Gere to K. Koneval "BASF Corporation, Inmont Site Hawthorne, New Jersey RCRA Storage Pad Data" Accutest "Analytical results form the RCRA Drum Storage Pad "
12b	9/28/87 BASF Corporation to NJDEP "Amendment No. 1 – Closure Plan for Hazardous Storage Area and Underground Tank BASF Corporation - Inmont Site, Hawthorne, New Jersey (EPA ID# NJD00216537"
12b	Undated Hand written notes "Underground Storage Tank (UST)"; PCB contamination adjacent transformer pad next to Bldg. 10; Storage Pad "; attached: 6/22/89 Envirotech Research, Inc report attached
12b	Various Dates – Collection of Sample analyses from several sources re Calgon with marginalia
12b	11/82 Geraghty & Miller Preliminary Evaluation of Ground Water Conditions at Inmont Corporation's Plant Hawthorne, New Jersey
12b	12/82 Geraghty & Miller Preliminary Evaluation of Ground Water Conditions at Inmont Corporation's Plant Hawthorne, New Jersey
12b	8/84 "Summary of Groundwater Conditions at Inmont Corporation's Plant" prepared by Geraghty & Miller, Inc.
12b	10/91 Baker Environmental, Inc. prepared for UTC New Jersey Pollutant Discharge Elimination System Discharge to Groundwater Permit Application Former Inmont Corporation Facility in Hawthorne, New Jersey
12b	6/7/91 Hawthorne Municipal Wells Summary Sampling Report McLaren Hart to United Technologies Corporation
12b	7/94 Baker Environmental Inc. Water Allocation Permit Application Volume I of II Appendix A prepared for UTC
12b	7/94 Baker Environmental, Inc. prepared for UTC New Jersey Pollutant Discharge Elimination System Discharge to Groundwater Permit Application Volumes I, II, III
12b	9/15/92 D. Webster to R. Trinks, W. Mock "Hawthorne Status Report" attaching 9/15/92 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – August 1992 BASF Corporation (Former Inmont Corporation) Facility – Hawthorne Borough, Passaic County, New Jersey – ECRA Case #85563"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
12b	10/93 Baker Environmental, Inc. "Final Report Extraction System Studies Results for Aquifer Restoration at the Former Inmont Facility Hawthorne, New Jersey" prepared for United Technologies Corporation
12b	10/93 Baker Environmental, Inc. "Final Report Final Soil Cleanup Report United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12b	11/25/98 Baker Environmental, Inc. to NJDEP "Cleanup Plan Progress Report – October 1997 through September 1998 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	11/4/98 Baker Environmental, Inc. to NJDEP "Hawthorne MUA Dewatering Activities Impact Monitoring Program Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12b	11/97 Baker Environmental, Inc. "4-84 Remedial Action Area Backfill United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12b	11/98 Submission to BEECRA, NJDEP "Final Report Quarterly Groundwater Sampling Event Second Quarter 1998 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Volume I" prepared by Baker Environmental, Inc
12b	12/18/98 Submission to BEECRA, NJDEP "Final Report Second Round Quarterly Groundwater Sampling Event Third Quarter 1998 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Vol. 1" prepared by Baker Environmental, Inc
12b	1988 Monitoring Report – Transmittal Sheet BASF Corporation –Chemicals Division(Formerly Inmont Division)
12b	3/11/98 Baker Environmental, Inc. to NJDEP "Response to NJDEP's letter of February 20, 1998 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12b	3/24/95 Baker Environmental, Inc. "Summary of PCB Area Remedial Action Former Inmont Corporation Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 585563"
12b	4/30/96 Baker Environmental, Inc. to NJDEP "Request for Permission to Discharge Development Water into Well IW1-92 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563 "
12b	4/96 Baker Environmental, Inc. "4-84 Remedial Action Area Summary United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12b	6/93 Baker Environmental, Inc. "Specifications Backfilling Design United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ECRA Case No. 85563
12b	6/94 Baker Environmental, Inc. "Attachment Volume 1 of 1 Attachments to June 22, 1994 Response to NJDEP Letter dated May 23, 1994 United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 "
12b	7/94 "(Volume II of III) New Jersey Pollutant Discharge Elimination System Discharge to Groundwater Permit Application United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12b	7/94 Baker Environmental, Inc. "Volume II of II Appendix A Water Allocation Permit Application United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563
12b	7/99 Submission to BEECRA, NJDEP "Final Report Fourth Round Quarterly Groundwater Sampling Event First Quarter 1999 at the United Technologies Corporation Former Inmont Facility Hawthorne, New Jersey ISRA Case No. 85563 Volume I of IV" prepared by Baker Environmental, Inc
12b	12/1/95 Baker Environmental, Inc. Letter/report to NJDEP re BASF Corporation (former Inmont facility) Summary of the Discovery of Buried Drums in the 4-84 Remedial Action Area ISRA Case No. 85563
12b	12/12/89 Fred C. Hart Associates, Inc. Supplemental Sampling Plan and Supplemental Sampling Plan Addendum Results Report for Former Inmont Facility, Hawthorne, New Jersey
12b	12/13/89 Fred C. Hart Associates, Inc. Supplemental Sampling Plan Addendum II for Former Inmont Facility, Hawthorne, New Jersey
12b	2/28/90 Fred C. Hart Associates, Inc. Cleanup Plan for Inmont Corporation Facility Hawthorne, New Jersey prepared for United Technologies Corporation

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<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
12b	3/18/96 Baker Environmental, Inc. to NJDEP Response to NJDEP Letter dated February 15, 1996 regarding the Discovery of Buried Drums in the 4-84 Remedial Action Area BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563
12b	3/24/95 Baker Environmental, Inc. "Summary of PCB Area Remedial Action Former Inmont Corporation Inmont Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 585563"
12b	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
12b	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
12b	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
12b	6/92 Baker Environmental, Inc. Soil Remediation Summary United Technologies Corporation/Inmont Facility Hawthorne, New Jersey ECRA Case No. 85563
12b	7/94 Baker Environmental Inc. Water Allocation Permit Application Volume II of II Appendix A prepared for UTC
12b	7/94 Baker Environmental, Inc. Hydrogeologic Report for Water Diversion Permit Application for the Former UTC-Inmont Facility Hawthorne, New Jersey Vol. II of II
12b	8/9/91 Baker Environmental, Inc. to NJDEP Submission of Draft Field Operations Plan for the Extraction-System Studies and Semi-Annual Ground-Water Sampling at the UTC-Inmont Facility in Hawthorne, New Jersey
12b	1/12/89 O'Brien & Gere Log Sheets hand drawn sketches of tanks, notations re tanks, product lines, sewer impact,; attached: 1/20/86 SRS, Inc. invoice
12b	1/23/89 K. Koneval memo to T. Szelest "Hawthorne / ETC QA/QC Data" data for analysis of Passaic River Silt in the tanks from Bldg. 18 be reviewed.
12b	1/27/89 T. Szelest to K. Koneval "Hawthorne / ETC Laboratory Data" consulted with both K. Hillig and John Moote re ETC Lab results of Passaic River silt in Bldg 18 tanks.
12b	10/9/89 Lowenstein Sandler to NJDEP "DGW Closure/Post-Closure NJPDES Permit NJ0002453; BASF Corporation-Chemicals Division: Hawthorne, Passaic County" attached: 8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
12b	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12b	11/7/88 W. Mock to Chemical Waste Management verifying his authorization to test acid solids materials on Waste Profile Sheet H76494, which is attached.
12b	12/1/88 T. Szelest to OHM requesting additional background information re ETC Findlay Laboratory results; attached : ETC Lab Report dioxin
12b	12/2/93 W. Mock fax to P. Webb 11/3/93 Troy Charlton, UTC Environmental Project Engineer to NJDEPE "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12b	12/7/89 O'Brien & Gere to Hart Environmental Management Co. Envirotech Research Inc. 6/22/89 analytical results Soils excavated from former RCRA Drum Storage (PCBs)
12b	1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, NJ RCRA Storage Tank Background Information Outline"
12b	1988 Results of 5/6/88 & 6/7/88 Sampling Events w/ Table 3 "NJDEP Typical Guidelines for Remediation of Water & Soils, and Table 4 "Ground Water Elevation Data Summary," and 4/88 Test Boring Logs

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
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Request No.	Identification and Description of Responsive Document
12b	3/20/89 W. Mock to G. Gagis, H. Hintz, K. Koneval, U. Soenksen, T. Szelest "RCRA Development Well Water" attached : 1/23/89 Laboratory Resources Inc. sampling analysis 3/15/89 W. Mock to PVSC Agreeing to PVSC Rules & Regs 3/1/89 letter "Discharge of Liquid Waste" 2/10/89 W. Mock to PVSC re Discharge of Monitoring Well Water to PVSC 1/3/89 W. Mock to PVSC requesting permission to discharge 1500 gallons of monitoring well and cleaning water to PVSC and attaching 8/17/88 O'Brien & Gere Wastes Characterization Results sent to DuPont 3/13/89 PVSC Rules & Regulations Concerning Discharges to the PVSC Treatment Works
12b	3/30/94 rev 3/31/94 J. McKeon memo w/attachment to J. Poff "Hawthorne Facility – RCRA Status"
12b	4/11/89 K. Koneval letter to NJDEP enclosing lab results in order for determination re classification of materials can be made; attached ETC Findlay Laboratory Results
12b	4/18/89 AETC to W. Mock enclosing analysis of 6 soil samples sent to Townly [Townley] re PCB
12b	4/27/89 Handwritten W. Mock notes re PCB levels K. Hillig quotes re Townly readings; second sheet records PCB readings
12b	4/7/89 Envirotech Research, Inc. to O'Brien & Gere enclosing sampling results
12b	6/10/88 Accutest Laboratories Report of 5/88 Samplings
12b	6/16/88 Accutest Laboratories results of 5/88 Samplings
12b	6/16/92 Baker Environmental, Inc. to Troy Charlton, (UTC) "Results of Soil Investigation at the Former RCRA Storage Areas at BASF's Hawthorne, NJ Property"
12b	7/15/88 OHM to O'Brien & Gere enclosing ETC Findlay Laboratory analytical results re DCB
12b	7/19/88 C.R. Evans to U. Soenksen "Hawthorne Decommissioning Status Update" "During the removal of this unit [in Bldg. 25], the transformer fell on its side and oil containing 49 ppm PCBs was spilled. OHM personnel immediately cleaned up the spill. This occurred on the waste treatment pad."
12b	7/21/88 OBG Laboratories, Inc. Sampling results
12b	7/22/93 D. Webster memo "Hawthorne RCRA Status" to J. Wehman summary of Baker Environmental findings
12b	7/26/88 B. Handog handwritten to W. Mock "Bulk Asbestos Analysis" none detected by Laboratory Testing Services
12b	7/5/89 NJDEP to Lowenstein Sandler "DGW Closure/ Post closure Section of NJPDES Permit No. NJ0002453 BASF Corporation – Chemicals Division; Hawthorne, Passaic County"
12b	8/15/88 OBG Laboratories, Inc. "Purgeable Priority Pollutants" Sampling Report – Pipes
12b	9/16/88 W. Mock to K. Koneval "RCRA Closure Underground Tank Removal Phase Ref: Memo to File, 9/13/88- R. Cawley, O'Brien & Gere" attached: 10/26/88 O'Brien & Gere Analytical Summary former hazardous waste storage tank, and hazardous waste storage pad)
12b	9/29/88 OHM to O'Brien & Gere enclosing ETC Findlay analytical report re acid brick; OHM recommends disposal as hazardous waste
12b	1988 NJPDES Final Permit Modification" requesting notification if recipients plan to attend meeting; 4/4/88 Meeting Attendance Sheet 2/4/88 W. Mock handwritten meeting notations; 1988 O'Brien & Gere "BASF Corporation Inmont Site Hawthorne, NJ RCRA Storage Tank Background Information Outline" lists documents and Plans,
12b	1/29/86 A. Schneid memo to W. Mock "Tank Removal and Consolidation of Building #4 Tank Farm" attached chart includes Tank#, year built, capacity, original use
12b	1/3/89 Hazardous Waste Manifest CWMA 448832; attached: 10/6/88 handwritten request W. Mock to OHM to retype Manifest OHM H 76467 with suggested revisions; OHM 10/4/88 to W. Mock encloses OHM H 76513, which incorporates, suggested revisions.
12b	1/4/89 Uniform Hazardous Waste Manifest NJA 0537762 & 1/3/89 Uniform Hazardous Waste Manifest NJA 0537761 with 12/88 Solvent Recovery Service Notification of Shipment of a Hazardous Waste Restricted from Land Disposal & Solvents Recovery Service Hazardous Waste Data Sheet & ETC Findlay Laboratories Report 11/1/88

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests

**SOURCE OF INFORMATION**

<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
12b	1/4/89 Uniform Hazardous Waste Manifest NJA 0537762 & 1/3/89 Uniform Hazardous Waste Manifest NJA 0537761 with 12/88 Solvent Recovery Service Notification of Shipment of a Hazardous Waste Restricted from Land Disposal & Solvents Recovery Service Hazardous Waste Data Sheet & ETC Findlay Laboratories Report 11/1/88
12b	10/12/88 ETC Findlay Laboratories Report
12b	10/12/88 ETC Findlay Laboratories Report
12b	10/2/88 O'Brien & Gere Transmittal to K. Koneval & W. Mock of OHM's 9/29/88 letter enclosing ETC Findlay Laboratory 9/22/88 Report (sample photographs of Bldg. #6 Floor not attached)
12b	10/25/88 OHM to ThermalKEM, Inc. enclosing Waste Characterization Form ST-00002-7323
12b	10/26/88 ETC Findlay Laboratories Report
12b	10/26/88 ETC Findlay Laboratories Reports (2)
12b	10/26/88 ETC Findlay Laboratories Reports (2)
12b	10/31/88 ETC Findlay Laboratories Report [NB Several different reports issued 10/31/88]
12b	10/31/88 ETC Findlay Laboratories Report [NB Several different reports issued 10/31/88]
12b	10/31/88 ETC Findlay Laboratories Report [NB Several different reports issued 10/31/88]
12b	10/4/88 ETC Findlay Laboratories Report
12b	10/4/88 ETC Findlay Laboratories Report
12b	11/1/88 ETC Findlay Laboratories Report
12b	11/15/88 ThermalKEM CyanoKEM to W. Mock enclosing Authorization Request Form as required by SC Dept. of Health and Environmental Control upon acceptance of waste streams
12b	11/18/88 O'Brien & Gere transmittal to W. Mock of OHM's 11/11/88 letter enclosing ETC Findlay Laboratory 11/4/88 report
12b	11/29/88 ENSCO Waste Material Data Sheet #12065
12b	11/29/88 Generator's Waste Material Profile Sheet OHM H 76656
12b	12/13/89 Supplemental Sampling Plan Addendum II for the Former Inmont Facility Hawthorne, NJ prepared for United Technologies by Fred C. Hart, Inc.
12b	12/14/92 NJDEPE to UTC Inmont Corporation Hawthorne Borough, Passaic County ECRA Case #85563" response to 6/26/92 Soil Remediation Summary Report, 7/9/92 letter, 7/10/92 Addendum A to Soil Remediation Summary Report and 8/14/92 Treatability Study Results Report submitted by Baker Environmental, Inc.
12b	12/2/87 Fred C. Hart Inc. to NJDEP enclosing summary of analytical results of sampling of existing groundwater monitoring wells
12b	12/9/88 Generator's Waste Material Profile Sheet OHM H 76497
12b	12/9/91 D. Webster memo to U. Soenksen "Hawthorne Remediation" meeting with UTC, UTC consultants, NJDEPE and BASF to review plans for further remediation
12b	2/22/86 Canonie Engineers to W. Mock "Proposal Partial Tank Farm decommissioning API Ink division Hawthorne, New Jersey"
12b	3/14/90 O'Brien & Gere comments to BASF on UTC ECRA Cleanup Plan for the Hawthorne Facility
12b	4/3/86 Canonie Engineers to Walter Mock "Analytical Results and Proposal Addendum Tank Farm Decommissioning API, Inc. Division Hawthorne, New Jersey"
12b	4/30/92 NJDEPE to UTC comments on status reports/sampling
12b	4/4/88 ETC Findlay Laboratories Report
12b	4/4/88 ETC Findlay Laboratories Report
12b	4/6/93 NJDEPE to UTC responding to 1/21/93 Baker Environmental, Inc. correspondence
12b	4/7/93 NJDEPE to UTC responding to 1/12/93 Revised Proposal for the Addendum to the Groundwater Cleanup Plan and the 1/25/93 correspondence submitted by Baker Environmental, Inc. on behalf of UTC [rejecting discharges to Passaic River]
12b	5/19/86 Canonie Environmental to A. Schneid enclosing Generator's Waste Profile Sheets for materials in tank from tank storage decommissioning; lab work conducted by Kramer Chemical
12b	5/27/89 W. Mock memo to W. Beaman "Deletion of Final Assets" with attachment of "Tank Inventory Chart" includes tank #, year built, capacity, original use



Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests

**SOURCE OF INFORMATION**

<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
12b	6/12/85 R. Panicucci, Lan Associates to File " Site Meeting 6/4/85"
12b	6/19/92 NJDEPE to UTC responding to "reports up to and including 3/20/92 Post Excavation Sampling and Analysis Plan
12b	7/13/89 K. Koneval to UTC conditions at Hawthorne Facility that should be addressed under UTC ECRA plan ; attached: Townley Research and Consulting, Inc. sampling analysis; attached: O'Brien & Gere log sheet noting PCB Sample locations and readings; attached: 5/11/89 K. Hillig to K. Koneval BASF Analytical Lab PCB and TPH results; attached: O'Brien & Gere RCRA UST showing location of product transfer line and varnish transfer lines
12b	8/25/89 UTC to NJDEP "Response to DEP Comments Dated July 20, 1989, Former Inmont Corporation – Hawthorne Facility, 150 Wagaraw Road, Hawthorne Boro, Passaic County – ECRA Case #85563"
12b	1/29/86 NJDEP to Mayor of Hawthorne attaching results of municipal wells water samples conducted by Environmental Testing and Certification
12b	1/29/86 NJDEP to Mayor of Hawthorne attaching results of water samples from municipal wells
12b	10/17/89 Dave Peterson of Laboratory Resources, Inc to R. Trinks forwarding Laboratory Resources, Inc. 10/17/89 Report of Effluent Monitoring Results
12b	3/18/86 W. Mock to Borough of Hawthorne forwarding results of well water analysis
12b	3/28/90 Trinks to D. Stone forwarding Laboratory Resources, Inc. 11/30/89 & 1/23/90 Reports of Effluent Monitoring Results
12b	3/4/86 Measurement Sciences Corporation to Walter Mock forwarding results of well water analyses
12b	3/4/86 Measurement Sciences Corporation to Walter Mock forwarding results of well water analyses
12b	4/11/86 NJDEP to Mayor of Hawthorne attaching results of municipal well water samples analyses as reported by Nytest Environmental, Inc. on 3/18/86
12b	5/26/89 W. Mock to E. Skula "Hawthorne Municipal Water Analysis Results"
12b	6/25/85 Measurement Sciences Corporation to Gus Gaggis reporting results of well water sample analyses
12b	7/25/84 Draft Summary of Ground-Water Conditions at Inmont Corporation's Plant Hawthorne, New Jersey with sampling results
12b	7/8/85 NJDEP to G. Gaggis, Hawthorne Plant Mgr. Enclosing soil sampling results
12b	9/7/84 Geraghty & Miller to Walter Hanzl differing viewpoints re analytical testing performed by NJDEP and resampling required by NJDEP
12b	9/9/86 NJDEP Directive to Calgon to conduct RI/FS re alleged contamination of municipal wells by Calgon [includes results of sampling conducted by NJDEP]
12b	2/2/99 Dames & Moore to NJDEP "Scope of Work for remediation of PCB-Impacted Soil at Location PR-14; regarding Site Improvement Program at BASF Corporation's Hawthorne, New Jersey Facility (ISRA Case No. 85563)"
12b	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Base Neutral Compounds detected in Soil beneath Proposed Demolition Contract Area"
12b	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Lead & PCBs detected in Soil beneath Proposed Demolition Contract Area"
12b	3/26/97 Dames & Moore "Draft - Analytical Results Summary of Volatile Organic Compounds detected in Soil beneath Proposed Demolition Contract Area"
12b	5/14/97 Dames & Moore to Brian Diepeveen "Summary of Analytical Results Greater than Most Stringent NJDEP Soil Cleanup Criteria Beneath Proposed Demolition Contract Area"
12b	6/17/97 IEA of New Jersey (An American Environmental Network Laboratory "AEN Inc.") to Dames & Moore Soil Samples PCBs BASF Waste Characterization
12b	6/27/97 Brian Diepeveen to Clean Earth of New Castle, Inc. "Soil Profile – BASF Hawthorne Site"
12b	7/3/96 Dames & Moore to Brian Diepeveen "results of May 1996 Soil Investigation at BASF Corporation's Hawthorne, NJ Facility"
12b	7/3/97 Brian Diepeveen to NJDEP "Recycling of Petroleum Hydrocarbon Contaminated Soils from: BASF Corporation 150 Wagaraw Road Hawthorne, New Jersey 07506" analytical data and Clean Earth of New Castle, Inc. (CENC, Inc.)
12b	8/19/96 Brian Diepeveen to UTC "BASF Corporation /Hawthorne, NJ Results of May, 1996 Soil Investigation"



**Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
SOURCE OF INFORMATION**

<b>Request No.</b>	<b>Identification and Description of Responsive Document</b>
12b	1/31/92 "Interim Soils Cleanup Report Former Inmont Facility, Hawthorne, NJ Volume 1" prepared by McLaren/Hart [appendices not included]
12b	11/23/88 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Sampling Results EPA ID #NJD 002165371" Results from RCRA Soil Sampling at Inmont Site
12b	12/82 "Preliminary Evaluation of Groundwater Conditions at Inmont Corporation's Plant" December 1982 prepared by Geraghty & Miller, Inc.
12b	2/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12b	3/16/92 Baker Environmental, Inc. Addendum No. 1 Municipal Well and Treated Effluent Sampling and Analysis 1991 SAGS Report for the Former UTC-Inmont Facility in Hawthorne, NJ" prepared for UTC and NJDEPE
12b	3/89 "Supplemental Sampling Plan for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12b	3/92 Baker Environmental, Inc. Results from Semi-Annual Groundwater Sampling Program
12b	4/92 "Final Bench Scale PACT System Treatability Testing Report for the Treatment of Groundwater from the United Technologies Corporation / Inmont Corporation Hawthorne, NJ Facility for Baker Environmental, Inc." prepared by Zimpro Passavant Environmental Services, Inc.
12b	5/21/90 "SSPA II Cleanup Plan for Former Inmont Corporation Facility Hawthorne, NJ ECRA Case No. 85563" prepared by Fred C. Hart Associates, Inc.
12b	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
12b	5/92 Addendum to the Final Bench Scale PACT System Treatability Testing Report for the Treatment of Groundwater from the United Technologies Corporation / Inmont Corporation Hawthorne, NJ Facility for Baker Environmental, Inc." prepared by Zimpro Passavant Environmental Services, Inc.
12b	6/1/89 O'Brien & Gere to NJDEP "BASF Corporation – Inmont Site Hawthorne, NJ RCRA Closure Summary EPA ID #NJD 002165371" RCRA Closure Report
12b	6/10/91 McLaren Hart to UTC enclosing 6/7/91 Summary Report re sampling of three Hawthorne Municipal Wells on 4/25/91.
12b	7/28/87 Warren Goldberg Berman & Lubitz to UTC enclosing 2/20/85 "Malcolm Pirnie Potential Hazardous Waste Site Preliminary Assessment Hawthorne Municipal Wells "
12b	7/90 "Specifications for The Removal of Soil at the Inmont Corporation Facility Hawthorne, NJ" prepared for United Technologies Corporation prepared by Fred C. Hart Associates, Inc.
12b	8/11/87 Extra Copy of SES Appendix prepared by O'Brien & Gere
12b	8/84"Summary of Groundwater Conditions at Inmont Corporation's Plant" prepared by Geraghty & Miller, Inc. [second phase of investigation]
12b	1/10/95 Baker Environmental, Inc. to NJDEP "PCB Sample PTP-7-BS Remediation Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" enclosing 3 photos and map
12b	1/21/93 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE Comments to Soil Remediation Summary Report BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12b	10/6/89 ECRA "Decommissioning and Demolition Report BASF Corporation Inmont Site Hawthorne, NJ" prepared by O'Brien & Gere
12b	11/26/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments on Remediation of PCB Area Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached: 1/26/96 Baker Environmental, Inc. to NJDEP "NJDEP Comments on Remediation of PCB Area Near Building 10 Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12b	11/3/93 UTC to NJDEP "Xylene Contamination which was Discovered in the Vicinity of the PCB Transformer Area at the BASF Hawthorne Facility"
12b	12/13/96 Baker Environmental, Inc. to NJDEP "October 23, 1996 NJDEP Comments to 4-84 Remedial Action Area Summary Report Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
12b	12/29/94 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation Hawthorne Boro, Passaic County, New Jersey ISRA Case # 85563" Comments on letters dated 6/22/94 and 9/16/94
12b	3/24/94 Baker Environmental, Inc. to UTC Undated "Methodology Utilized to Determine Maximum and Average Groundwater Contaminant Concentrations UTC-Hawthorne, New Jersey Facility" with attached spreadsheets
12b	3/24/95 Baker Environmental, Inc. to NJDEP "Summary of PCB Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563" attached summary of analytical data
12b	3/3/95 Baker Environmental, Inc. to NJDEP "Proposed Hawthorne MUA dewatering Activities Impact Monitoring Program Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	3/89 "ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ" prepared by Fred C. Hart Associates, Inc.
12b	4/17/95 Baker Environmental, Inc. to NJDEP Cleanup Plan Progress Report – January through March 1995 BASF Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	4/18/97 "Remedial Action Report Off-Site Sediment and Soil Removal Action" prepared for Merck & Co., Inc. for the former Calgon Corp. Metasol Plant prepared by Rust Environment & Infrastructure
12b	4/26/95 Baker Environmental, Inc. to NJDEP April 4, 1995 PCB Transformer Area Remedial Action Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case Number 85563"
12b	5/11/95 Baker Environmental, Inc. to NJDEP "Continued Delineation of Area 4-84 Former Inmont Corporation Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563"
12b	5/16/94 Baker Environmental, Inc. to UTC "Revised Maximum Groundwater Contaminant Concentrations UTC-Hawthorne, New Jersey Facility" with attached spreadsheet
12b	5/2/95 NJDEP to UTC "Administrative Consent Order (ACO) In the Matter of United Technologies Corporation Inmont Corporation ISRA Case #85563"
12b	6/22/94 Baker Environmental, Inc. to NJDEPE "Response to NJDEPE letter dated May 23, 1994 United Technologies Corporation (former Inmont Corporation) Facility Hawthorne Borough, Passaic County, New Jersey ISRA Case No. 85563" [cover letter only]
12b	7/13/89 OHM Corporation fax to O'Brien & Gere advising changes needed if > 50 ppm PCBs;; attached: Generator's Waste Material Profile Sheet OHM H76697
12b	Undated "Appendices A through G, I Former Inmont Facility Hawthorne, NJ "
12b	Undated Excel Spreadsheets "Estimated Maximum Concentrations (Bedrock and Overburden)
12b	Undated Excel Spreadsheets with monitoring well sampling
12b	1/14/91 D. Webster to UTC "Follow-up From Meeting on January 10, 1991" relating to "Fuel Tank Removal," "PCB Impacted Soil," "Stormwater Drainage Ditch"
12b	10/11/91 Baker Environmental, Inc. to D. Webster "NJPDDES Permit Application Former Inmont Corporation Facility, Hawthorne, NJ" for BASF review and endorsement
12b	12/2/87 Fred C. Hart Associates, Inc. to E. Fox, NJDEP Case Mgr. Enclosing "data summary from the sampling of existing groundwater monitoring wells "
12b	12/30/88 T. Hays [BASF in-house counsel] to Whilden Parker, Esq., UTC "UTC Hawthorne ECRA Comments" As agreed at meeting with UTC, Fred C. Hart Associates, Inc. and BASF, BASF's comments on draft "ECRA Samplings Plan Results.
12b	2/13/87 Fred C. Hart Associates, Inc. to Keith Frye [Dir. Environmental Affairs] "Addendums to ECRA submittal for Hawthorne Facility" enclosing NJDEP's letter of deficiency
12b	2/16/90 Fred C. Hart Associates, Inc. to D. Webster "Chapters 1, 2, 3 of the Inmont Hawthorne Facility ECRA Cleanup Plan" 2/90 Draft version for BASF review and comments – marginalia
12b	5/21/90 Fred C. Hart Associates, Inc. to NJDEP "Inmont Corporation Hawthorne Facility 150 Wagaraw Road, Hawthorne, NJ ECRA Case No. 85563" reports not enclosed as per cover letter. Response for explanation of high readings on select samples
13	1997 Dames & Moore "BASF Corporation 1.0 Introduction" excerpt broad site history, former owners, remediations

Lower Passaic River Study – BASF's May 1, 2003 Responses to EPA Region II §104(e) Requests  
**SOURCE OF INFORMATION**

Request No.	Identification and Description of Responsive Document
13	5/29/92 "Site History Former Inmont Facility 150 Wagaraw Rd. Hawthorne, New Jersey" prepared for United Technologies Gsvsvexmsr f} Baker Environmental, Inc.
13	1/7/99 "DRAFT Hawthorne Timeline" UTC ownership passing to BASF Remediation 'Hawthorne Site January 7, 1999 Borough Committee Meeting" slide "Operational History"
13	1999 Undated "Standby Statement: BASF Hawthorne, NJ Site" Announcement that BASF and Borough personnel met to discuss vacant property – some site history
13	2/3/99 Borough of Hawthorne to B. Pearson "Future of Hawthorne Committee Minutes" [January 7, 1999] Presentation by BASF Hawthorne Site history, remediation, plans to sell property
13	Undated "Former Inmont Facility Hawthorne, Passaic County ISRA #85563" "Chronology Summary"
13a	12/19/86 GIS includes the Waste Summary form Annual Report 1985, corporate history, Waste generator/Transporter information
13c	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 146: doesn't recall discussions about Weidman Dye Company using the site to dump bad batches re Exhibit 8
13c	10/11/00 A. Gaggis Deposition testimony in re <u>UTC v. American Home Assurance</u> at page 152: Exhibit 9 5/13/85 Lan Associates 2-page memo. Doesn't recall, as stated in the memo, that he said the entire area had been used for dumping of waste from the Paterson Dye Works.
13d	11/82 Geraghty & Miller Preliminary Evaluation of Ground Water Conditions at Inmont Corporation's Plant Hawthorne, New Jersey
13d	12/82 Geraghty & Miller Preliminary Evaluation of Ground Water Conditions at Inmont Corporation's Plant Hawthorne, New Jersey
13d	7/1/87 O'Brien & Gere ECRA Initial Notice ["PRELIMINARY" stamped on cover; report contains marginalia]
13d	2/28/90 Fred C. Hart Associates, Inc. Cleanup Plan for Inmont corporation Facility Hawthorne, New Jersey prepared for United Technologies Corporation
13d	3/89 ECRA Sampling Plan Results for Former Inmont Facility Hawthorne, NJ prepared for UTC by Fred C. Hart Associates, Inc.
13d	5/90 "Supplemental Sampling Plan Addendum II Results Report for Former Inmont Facility Hawthorne, NJ" prepared for United Technologies Corporation by Fred C. Hart Associates, Inc.
14	9/13/85 Lan Associates Inc. "General Information Submission (GIS) and Site Evaluation Submission (SES) United Technologies Corp. / Inmont Corp. Hawthorne Facility" ECRA submissions

Inmont Corp., Gregg Street & Route 17, Lodi, New Jersey.  
March 6-17, 1969 (J. Parrapato)

Oil in Milbank Brook, a tributary of the Passaic River was traced to this company. It was found that an oil hose broke while delivery was being made of #4 Fuel Oil by the Hess Oil Company. A quantity of oil ran into the Brook before the Commissioners' Inspectors had reached the scene. The company agreed to clean up the banks so that additional oil would not reach the Brook. They also agreed to go approximately 200 yards down stream to clean oil from along the banks. This was done and clean-up was completed by March 17, 1969.

April 2, to December 3, 1969.

Samples of surface run off from the property of this company entering into Milbank Brook were analyzed and found to be polluting. On April 8, 1969, Mr. Lubetkin wrote a letter to the company stating discharges contained sulfides, hexavalent chromium, oil, and solvents etc., and they were highly polluting, and this must be halted at once.

On April 29, 1969, Mr. Lubetkin received a letter from this company which admitted the oil problem as an accident but denied other pollution. They suggested a conference at their site so that the pollution could be pointed out to their representative. A conference was finally arranged in June and subsequent to the conference on June 23, Mr. Lubetkin sent a letter to this company pointing out the glaring examples of existing pollution and situations for potential future pollution. Mr. Lubetkin reiterated four points that were made at the conference as follows:

1. Clean out tarry resin mass from the two ponds, and the wide ditch between the two ponds.
2. Pipe the open ditch at the railroad siding from one underpass to the other and fill in the ditch so that carloading spills would not be washed into Milbank Brook.
3. Change the antioxidant in the cooling water from zinc chromate to something that is acceptable in the stream. Use a biogradable substance which is non-metallic and had a low B.O.D.
4. Cover the platform loading drainage ditch to fine mesh screen to prevent trash and other material from entering the ditch.

The Inmont Corp., agreed to do all the work. However, the cleaning of the tarry substance had to wait till winter for the

material to coagulate properly so that it can be removed. All attempts to remove the material in warm weather failed. Work was finally completed, December 13, 1969, when the pollution was eliminated.

Violation & Elimination - Inmont Corporation - 150 Wagaraw  
Road, Hawthorne, New Jersey  
November 10, 1976

(W. Fiore)

2  
accident

On November 10, 1976, Mr. W. Halaka, Maintenance Engineer, Inmont, notified P.V.S.C. of a spill that occurred at the plant that morning.

Mr. Halaka explained that a vacuum condenser had not been properly emptied and the condensate, which contained red ink, overflowed through the vacuum pumps and onto the floor. The floor drain, which is connected to the sanitary sewer, was plugged and as the volume increased, the material flowed to another floor drain which discharged into the Passaic River. By 3:30 P.M. the blockage in the sanitary drain had been removed and the floor drain, which was connected to the Passaic River, was subsequently sealed, eliminating the violation.

Violation & Elimination-Inmont Chemical Corp., 150 Wagaraw  
Road, Hawthorne, New Jersey.

January 6, 1971

(T. Costello)

Inspector T. Costello traced green in the Passaic River to this plant. He found that heavy rain washed material from old fibers steel drums containing residue dye into storm drains. Sodium Hypochlorite was used to bleach residue dye in the storm ditches.

The company removed the drums and promised in the future they would be stored in a protected area.

In addition to the above, a pump in their pretreatment system failed. The maintenance foreman pumped the overflow to the storm system by mistake, contributing to the River problem. When this was pointed out they halted pumping immediately, and repiped the pump to the sanitary system.

March 22, 1971.

Inspector, T. Costello, traced oil in a storm ditch to this company and to a leaky oil pump. When the plant engineer was informed of this, he immediately switched to a stand-by-pump until leaky pumps could be repaired, thus eliminating pollution..

June 15, 1971.

At approximately 10:00 A. M. on June 15, 1971, while transferring filter press boxes of fluorescein from one building to another, some of the dye fell to the ground and heavy rains

844230131

Violation & Elimination-Inmont Chemical Corp., (continued)

washed the dye into yard drains, which thence emptied to the storm ditch, which, in turn discharges into the Passaic River. The company attempted to bleach the area, but green color was visible along the river banks approximately 1,000 ft. down stream. The color disappeared by 3:00 P. M. the same day.



Violation and Elimination - Inmont Chemical Company,  
Lodi, New Jersey

April 25- June 20, 1973

( J. Perrapato)

A review of the Industrial Waste Surveys by Mr. Lubetkin indicated that a discharge from this company may be polluting. Inspector Perrapato was directed to take samples of all their discharges. This was done on April 25, 1973. Analysis indicated that the discharge from their pipe #001 was polluting. Mr. Lubetkin wrote a letter to them on May 2, 1973, informing them of the pollution, and directing that they halt this at once.

No reply was received from this company, but Inspector Perrapato reported that this discharge (001) is only storm water during rain, carrying any material it might pick up in the yard. However, due to elevation, a stagnant pond is formed, wherein polluting material may have settled affecting any discharge. At the end of May, the pond had been dredged and cleaned of polluting bottom deposits.

When early June samples still indicated pollution, further cleaning was done until a sample taken on June 20, 1973 tested satisfactorily.

Inmont then engaged Pollution Abatement Consultants to make a site drainage study so as to finally clean up the pond. They disconnected and eliminated the 001 line from the storm sewer and filled in the "pond" to eliminate the

844230133

Violation - Inmont Chemical Company (con't.)

844230134

However in a letter to PVSC dated December 27, 1973 they noted that after heavy rainfalls, such as December 21, 1973 their site drainage is fine up to the point where Millbank Brook backs up and inhibits drainage. They felt that debris was blocking this stream at a point where it disappears under Fields Plastic Co. PVSC wrote to the N. J. Department of Environmental Protection to find out who was responsible for keeping the stream clear of debris.

Violation and Elimination - Inmont Corporation, Hawthorne,  
N.J.  
April 3-4, 1972

(T. Costello)

A light blue green color in the Passaic River was traced to this company. Chief Engineer B. D'Armiento notified Inspector Costello that a broken plug in building #5 allowed a drum of spilled material to reach the storm sewer.

The opening was sealed and the pollution eliminated.

During the past years problems have occurred at this plant when flourescein dye was discharged to the sanitary sewer. This dye, although innocuous and not harmful, did impart a green color to the sewage and to the water when it reached the river during rains and runoffs. The Inmont Corporation had installed a bleaching pre-treatment, but many times accidents occurred and the dye reached the Commissioners' sewer and thence New York Harbor.

Finally on April 11, 1972, the Commissioners were informed by Inmont that flourescein would no longer be handled at this plant after the next 60 days, thus eliminating this type of problem. The manufacturing of flourescein was discontinued June 15, 1972.

844230135

April  
30

Violation and Elimination-Inmont Chemical Corp.,  
150 Wagarow Road, Hawthorne, New Jersey-A green color  
in the Passaic River was traced back to this company .  
Investigation revealed that a faulty compressor was  
instrumental in the improper operation of presses. In  
removing the material from the presses, it was looser  
than normal and some fell to the floor. The night shift  
personel washed the material into the floor drain while  
cleaning up, thus by-passing their pre-treatment facili-  
ties. The compressor was repaired, eliminating this  
violation.

844230136

Violation and Elimination - Inmont Corporation,  
150 Wagaraw Road, Hawthorne, N. J.

April 14, 1975

(T. Costello)

During his routine inspection, River Inspector T. Costello, at 11:00 A.M. on April 14, 1975, noticed a discoloration of the water in the plant storm ditch going to the Passaic River.

When shown this, Operations Manager, H. S. Miller, explained that a spill of a red coloring material occurred when an operator, at 9:45 A.M. that morning, accidentally dumped the contents of a vacuum receiver tank into a yard drain that emptied into the storm ditch.

Mr. Miller estimated that about five gallons of a mixture of water, oil and red pigment was dumped. Mr. Miller stated that plant officials were taking immediate action to prevent recurrence of incidents like this by reviewing all cleaning procedures with plant operators.

844230137

Inmont Corporation (continued)

3. Solid rigid piping would be installed replacing flexible hoses which have broken in the past, causing accidental pollutions which by-passed the treatment tank. In the past, when a broken hose occurred, the concentrated fluorescein on the ground would take months before it was completely dissipated.

4. Changing of process production methods, whereby they were able to utilize the product in the liquid stage, thereby eliminating drying of the concentrated fluorescein. The liquid stage is much easier to handle than the dry stage.

5. They have eliminated a filtration step which was a source of leaks and possible sloppy workmanship, which could cause a pollution.

6. Better control of their bleaching operation, making it more automatic and less under the responsibility of an individual, who is subject to error. Automatic level alarms and pH control instruments are to be installed on the tank.

7. Types of pumps were to be changed to diaphragm pumps to eliminate possible packing leaks. Commissioners were promised that work on all of this would be started immediately, but the work would not be completed until 1970. However, they will be extra careful to watch for any accidental breaks during the remainder time until improvement were made.

Mr. Aquadro, from the Inmont Corporation, was very cooperative.

This company is a manufacturer of fluorescein dye. The waste from this company is discharged into the Hawthorne Sewer System, thence to the Passaic Valley Sewerage Commissioners' trunk sewer. The company is supposed to pre-treat the fluorescein dye to remove color before discharge into the Hawthorne system. One of the problems this company encountered was that fluorescein dust would accumulate on the company property and roofs, so that during times of rain, this material would be collected by the rain water and run off into the river, creating a bright green color in the river. Although this material is not detrimental to any fish life and is not toxic, it does create unsightly colors, and therefore is classified as polluting. The company was requested to close in its yard area and drains, collect the liquid, even during rain, and pre-treat this material to destroy color before discharging.

A conference was held in the company's office on October 21, 1969, between representatives of the Commissioners, of this company, and of the Borough of Hawthorne. At this conference, the company agreed to do several things in order to prevent fluorescein dust from accumulating on their property, and reaching the river, as follows:

1. Install a totally enclosed new reactor which would not be opened at any time during reaction, therefore confining dust.
2. Install a water scrubber in the reactor, with the water from the scrubber to be piped to a 15,000 gallon tank where it would be treated before it is discharged into the sewers.

May 24, 1950.

The Passaic Valley Sewerage Commissioners,  
24 Branford Place,  
Newark 2, New Jersey.

Gentlemen:- RE:- Dangerous Petroleum Solvent and Vapors  
in Hawthorne River Crossing and in the  
Interception Chamber at South 4th, St.,  
and 12th, Avenue, Paterson.

An evening conference was held on April 24, 1950 in Borough Hall, Hawthorne, attended by the Mayor and Commissioners of the Borough, Passaic Valley Sewerage Commissioners' representatives, and the General Manager of the Interchemical Company at Hawthorne, to determine ways and means of preventing the explosive and inflammable petroleum solvent from entering the Hawthorne sewers.

We emphasised the fact that despite two changes which had been made, the solvent trap and separator at the Interchemical plant was performing very poorly and was allowing a lot of the emulsion which contained the dangerous solvent to enter the Hawthorne sewer near the entrance to the river crossing, as our hourly samples on many successive days proved.

We also insisted that the separator must be made to remove all petroleum solvent before we could determine whether or not there were further objectionable features.

Interchemical promised to make a third change, to re-pipe the separator entirely, within a week. The alterations were completed on time and the separator put back in service on May 1, 1950.



Dangerous Petroleum Solvent and Vapors  
in Hawthorne River Crossing and in the  
Interception Chamber at South 4th, St.,  
and 12th, Avenue, Paterson.

Since then, frequent samples taken from the outlet of the separator as it leaves the chemical plant, and hourly samples at the entrance to the Hawthorne river crossing on successive days to date, indicate that the separator is performing efficiently and removing the emulsion which contains the volatile solvent called Xylol, which was the cause of our complaint. In addition, daily observations at the receiving chamber on the Paterson side indicate that the vapors of the Xylol solvent have disappeared.

The separated emulsion from the chemical plant is transported by tank truck to an oil refinery where the Xylol is recovered.

At the present time we have no cause for complaint against the Hawthorne sewage.

RCS/JMcH.

Respectfully submitted,

*Richard C. Smith*

Head of Chemical & Inspection Dep't.

844230141

BASF Corporation May 1, 2003  
Response to Request for Information

**BASF Corporation**

**BASF**

HELPING MAKE PRODUCTS BETTER™

# NOL Corporate Structure

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Structure](#)

[Officers and  
Directors](#)

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## RESTATED BY-LAWS OF

### BASF CORPORATION

#### ARTICLE I

##### Offices

**Section 1.01. Registered Office.** The registered office of the Corporation in the State of Delaware shall be established and maintained at the office of The Corporation Trust Company, 1209 Orange Street, in the City of Wilmington, County of New Castle, and said corporation shall be the Registered Agent of this Corporation.

**Section 1.02. Other Offices.** The Corporation may have offices, either within or without the State of Delaware, at such place or places as the Board of Directors may, from time to time, determine, or as the business of the Corporation may require.

#### ARTICLE II

##### Meetings of Stockholders

**Section 2.01. Annual and Special Meetings:** Time and Place of Meetings. Annual meetings of stockholders for the election of directors and the transaction of such other business as may properly be brought before such meetings shall be held at such date as the Board of Directors, by Resolution shall determine. If the annual meeting of stockholders is not held on the date designated therefor, the Board of Directors shall cause the meeting to be held as soon thereafter as convenient. Except as otherwise provided by law, special meetings of stockholders may be called at any time and for any purpose or purposes by (a) the President of the Corporation, (b) the Secretary of the Corporation, (c) the Board of Directors or (d) the holders of record of a majority of the shares of stock entitled to vote on the matters to be considered at such meetings. Annual and special meetings of stockholders shall be held at such place, either within or without the State of Delaware, and at such time and date as may be fixed, from time to time, by the Board of Directors, in the case of annual meetings, or as may be fixed by the person or persons calling the meeting, in the case of special meetings.

**Section 2.02. Notice of Meetings.** Except as otherwise provided by law, written notice of each annual or special meeting of stockholders stating the place, date and hour of the meeting and, in the case of a special meeting, the

purpose or purposes for which the meeting is to be held, shall be given personally, or by first-class mail, to each stockholder entitled to vote, not fewer than ten, nor more than sixty, days before the date of the meeting. Notice of a special meeting may be given by the person or persons calling the meeting, or upon the written request of such person or persons, such notice shall be given by the Secretary of the Corporation on behalf of such person or persons.

**Section 2.03. Adjournments.** When a meeting is adjourned to another date, hour or place, notice need not be given of the adjourned meeting if the date, hour and place thereof are announced at the meeting at which the adjournment is taken.

**Section 2.04. Quorum.** Except as otherwise provided by law, the Certificate of Incorporation or these By-Laws, the holders of a majority of the shares entitled to vote thereat, present in person or by proxy, shall constitute a quorum at all meetings of the stockholders, whether annual or special, for the transaction of business. If, however, such quorum shall not be present or represented at any meeting of the stockholders, the stockholders entitled to vote thereat may adjourn the meeting, from time to time, in accordance with Section 2.03 of these By-Laws until a quorum shall be present or represented.

**Section 2.05. Voting.** Each stockholder shall be entitled to one vote for each share of capital stock held by such stockholder. Except as otherwise provided by law, the Certificate of Incorporation or these By-Laws, when a quorum is present at any meeting, the vote of the holders of a majority of the shares constituting such quorum shall decide any question brought before such meeting.

**Section 2.06. Proxies.** Each stockholder entitled to vote at a meeting of stockholders or to express consent or dissent to corporate action in writing without a meeting may authorize another person or persons to act for such stockholder by proxy. Such proxy shall be filed with the Secretary before such meeting of stockholders or such corporate action without a meeting, at such time as the Board of Directors may require.

**Section 2.07. Action Without a Meeting.** Except as otherwise provided by law or the Certificate of Incorporation, any action required, or which may be taken at any annual or special meeting of stockholders may be taken without a meeting, without prior notice and without a vote, if a consent in writing, setting forth the action so taken, shall be signed by the holders of outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares entitled to vote thereon were present and voted. Prompt notice of the taking of any corporate action without a meeting by less than unanimous written consent shall be given to those stockholders who have not consented in writing. Such written consent shall be filed with the records of the Corporation.

## **ARTICLE III**

### **Directors**

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**Section 3.01. Powers.** Except as may otherwise be provided by law or in the Certificate of Incorporation, the business and affairs of the Corporation shall be managed by or under the direction of the Board of Directors, which may exercise all the powers of the Corporation and do all lawful acts and things which are not conferred upon or reserved to the stockholders by law, the Certificate of Incorporation or these by-Laws.

**Section 3.02. Number and Term of Office.** The Board of Directors of the Corporation shall be composed of not more than fifteen directors, who need not be stockholders. At each annual meeting of stockholders, each of the directors shall be elected by the stockholders to hold office until the next annual meeting of stockholders and thereafter until a successor shall have been elected and shall have qualified.

**Section 3.03. Chairman of the Board of Directors.** The Chairman of the Board of Directors shall be elected by the stockholders at the annual meeting and shall preside at all meetings of the Board of Directors and shall perform such other duties and have such other powers as may be assigned to the Chairman, from time to time, by the Board of Directors. The Chairman of the Board of Directors and the President may be the same person.

**Section 3.04. Resignations.** Any director or member of a committee may resign at any time by delivering a written notice to the Board of Directors, the President or the Secretary. Such resignation shall take effect at the time specified therein, or, if no time is specified, at the time of its receipt by the Board of Directors, the President or the Secretary. The acceptance of such resignation shall not be necessary to make it effective.

**Section 3.05. Removal.** Any director or the entire Board of Directors may be removed, with or without cause, at any time, by the affirmative vote of the holders of a majority of the shares then entitled to vote at an election of directors.

**Section 3.06. Vacancies.** If the office of any director, including the Chairman of the Board, becomes vacant by reason of death, resignation, incapacity, disqualification or otherwise, except by reason of removal by vote of stockholders at a meeting at which the vacancy caused by such removal is filled by the stockholders, the remaining directors by the vote of a majority of those then in office, at a meeting the notice of which shall have specified the filling of the vacancy as one of its purposes, may choose a successor. Any director elected to fill a vacancy shall hold office for the unexpired term in respect to which the vacancy occurred, and until a successor has been elected.

**Section 3.07. Executive Committee of the Board.** The Board of Directors may, by resolution passed by a majority of the whole Board appoint an Executive Committee of the Board of Directors consisting of four (4) or more directors, one of whom shall be the President. The Executive Committee shall, to the extent provided in such resolution, exercise the authority of the Board in the management of the business of the Corporation between

meetings of the Board. Vacancies occurring in the Executive Committee shall be filled by the Board of Directors by vote of the majority of the whole Board. In every case, the affirmative vote or written consent of all members of the Executive Committee shall be necessary to the validity of any action taken by it. In all appropriate cases the Executive Committee shall obtain advice of counsel as to legal matters before any action shall be taken by it. The meetings of the Executive Committee may be held in such place as the Committee may designate. The Secretary shall be present at meetings of the Executive Committee, and shall keep its records. A record of the proceedings of each of the meetings shall be certified by the Secretary under his hand, and shall be submitted to the Board of Directors at the earliest subsequent meeting of the Board at which such submission is practicable. All of the proceedings referred to in any such record that shall have been submitted to the Board of Directors and not expressly disapproved by the Board shall be deemed to have been approved and adopted as the action of the Board of Directors. The Board may rescind and revoke any action taken by the Executive Committee, but the Executive Committee may not, even between meetings of the Board, revoke any formal action of the Board of Directors.

**Section 3.08. Other Committees.** In addition to the Executive Committee provided for by Section 3.07 of these By-Laws, the Board of Directors may, by resolution passed by a majority of the whole Board, designate one or more other committees, each committee to consist of one or more of the directors of the Corporation. The Board may designate one or more directors as alternate members of any such committee, which directors may replace any absent or disqualified member at any meeting of the Committee. Any such committee, to the extent provided in the resolution of the Board of Directors or in these By-Laws, shall have and may exercise all the powers and authority of the Board of Directors in the management of the business and affairs of the Corporation, and may authorize the seal of the Corporation to be affixed to all papers which may require it. Such committee or committees shall have such name or names as may be determined from time to time by resolution adopted by the Board of Directors. Each committee shall keep regular minutes of its meetings and report the same to the Board of Directors when required by the Board of Directors to do so. All of the proceedings referred to in any such record that shall have been submitted to the Board of Directors and not expressly disapproved by the Board shall be deemed to have been approved and adopted as the action of the Board of Directors. The Board of Directors may rescind and revoke any action taken by any committee, but no committee may revoke any formal action of the Board.

**Section 3.09. Regular Meetings.** Regular meetings of the Board of Directors shall be held, from time to time, at the call of the President. Unless otherwise determined by the Board of Directors, no notice of regular meetings of the Board shall be required.

**Section 3.10. Special Meetings.** Special meetings of the Board of Directors may be called by the Chairman of the Board or the President, or upon the request of any three directors. If the executive officers refuse or fail to call a special meeting at the request of any three directors, such directors may call such meeting by mailing or telegraphing to each director notice thereof at

least five days before the meeting. Special meetings shall be held on at least two days notice to each director and shall be held at the time and place designated in the call and notice of the meeting.

**Section 3.11. Waiver of Notice.** Notice of a meeting need not be given to any director who submits a written waiver of notice, signed by such director, whether before or after the meeting. Neither the business to be transacted at, nor the purpose of, any meeting of the directors need be specified in any written waiver of notice. Attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except when a director attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened.

**Section 3.12. Quorum and Manner of Acting.** At all meetings of the Board of Directors, a majority of the total number of directors shall constitute a quorum for the transaction of business. The vote of a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board of Directors, unless a greater number is required by law. A majority of the directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. Notice of any adjournment of any special meeting of the Board of Directors to another time or place shall be given at least two days before the rescheduled meeting to the directors who were not present at the time of the adjournment and, unless such time and place are announced at the meeting, to the other directors.

**Section 3.13. Action by Unanimous Written Consent.** Any action required or permitted to be taken at any meeting of the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors or the committee, as the case may be, consent thereto in writing and the writing or writings are filed with the minutes of proceedings of the Board of Directors or the committee.

**Section 3.14. Telephonic Meetings.** Members of the Board of Directors or members of any committee of the Board may participate in a meeting of the Board of Directors or such committee by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and such participation in a meeting shall constitute presence in person at such meeting.

**Section 3.15. Compensation.** The directors may provide by resolution for reasonable compensation to directors other than salaried officers for their services in attendance at each regular and special meeting of the Board or Executive Committee attended and for their respective reasonable expenses of travel to each such meeting.

## **ARTICLE IV**

### **Officers**

**Section 4.01. Officers.** The executive officers of the Corporation shall be a

President, a Vice-Chairman, one or more Executive Vice Presidents, one or more Group Vice Presidents, one or more Senior Vice Presidents, one or more Vice Presidents, a Secretary, a Treasurer and a Controller. All such officers, as well as Assistant Secretaries, Assistant Treasurers and Assistant Controllers, shall be elected by the Board of Directors. The Chairman of the Board and the President may be the same person, and an Executive Vice President and Chief Financial Officer may be the same person, and a Group Vice President, a Senior Vice President, and a Vice President may also hold the offices of Secretary, Treasurer and/or Controller, but one person shall not hold more than one of the offices of President, Executive Vice President, Group Vice President, Senior Vice President or Vice President.

**Section 4.02. Term of Office; Resignation; Removal and Vacancies.** Each officer of the Corporation shall hold office until a successor is elected or appointed or until the officer's earlier resignation or removal. Any officer may resign at any time. Such resignation shall be made in writing and shall take effect at the time specified therein, or, if no time is specified, at the time of its receipt by the President or Secretary. The acceptance of a resignation shall not be necessary to make it effective. Any officer elected or appointed by the Board may be removed at any time, with or without cause, by the Board. Any vacancy occurring in any office shall be filled by the Board of Directors.

**Section 4.03. President.** The President shall be the chief executive officer of the Corporation, and, subject to the control of the Board of Directors, shall be responsible for directing the business of the Corporation within the framework of objectives, plans and policies approved by the Board of Directors. If the Chairman of the Board and the President are not the same person, then the president shall, in the absence of the Chairman of the Board, preside at all meetings of shareholders and directors. The President shall have the general powers and duties of supervision, direction and control of the conduct of the business of the Corporation usually vested in the office of the President of the Corporation. The President shall be responsible for the effectuation of all orders and resolutions of the Board. The President shall be a member of the Executive Committee of the Board, if there be one. The President may sign in the name and on behalf of the Corporation any and all contracts or other instruments pertaining to matters which arise in the ordinary course of business of the Corporation, and any and all contracts or other instruments of any nature pertaining to the business of the Corporation. The President may appoint such divisional and staff officers as the President deems appropriate.

**Section 4.04. Vice-Chairman.** The Vice-Chairman shall, in the absence of the Chairman of the Board and/or President, preside at all meetings of shareholders and directors and have such general powers and duties of supervision, direction and control of the conduct of the business of the Corporation as is usually vested in the President of a corporation, subject to such limitations as may from time to time be prescribed by the Board of Directors. The Vice-Chairman may sign in the name and on behalf of the Corporation any and all contracts or other instruments pertaining to matters which arise in the ordinary course of business of the Corporation.

**Section 4.05. Executive Vice Presidents.** The Executive Vice Presidents, in

the order as determined by the President, the Vice-Chairman, or by action of the Board of Directors, shall, in the absence or incapacity of the President, and the Vice-Chairman, subject to statutory limitations, perform the duties of the President, and also shall have such other powers and perform such other duties as may be prescribed or assigned to them from time to time by the Board of Directors. One of the Executive Vice Presidents may also hold the office of Chief Financial Officer. The Chief Financial Officer shall have such general powers and duties of supervision, direction and control of the conduct of the financial business of the Corporation as is usually vested in the chief financial officer of a corporation, subject to such limitations as may from time to time be prescribed by the Board of Directors.

**Section 4.06. Group Vice Presidents.** The Group Vice Presidents shall perform such duties and exercise such powers as may be prescribed or assigned to them from time to time by the President, the Vice-Chairman or the Board of Directors.

**Section 4.07. Senior Vice Presidents.** The Senior Vice Presidents shall perform such duties and exercise such powers as may be prescribed to them from time to time by the President, Vice-Chairman or the Board of Directors.

**Section 4.08. Vice Presidents.** Each Vice President, if any, shall have such powers and perform such duties as may be assigned to each Vice President from time to time by the President, Vice-Chairman or the Board of Directors.

**Section 4.09. Controller.** The Controller of the Corporation shall exercise proper audit control over the operations of the Corporation and shall maintain adequate accounting, statistical and other records showing the financial condition and operating results of the Corporation. He shall also perform such other duties as shall be required by the President, the Vice-Chairman or the Board of Directors.

**Section 4.10. Assistant Controllers.** Each Assistant Controller, if any, shall perform the duties of the Controller, in the case of the latter's absence or inability to act, and shall perform such duties as the President, the Vice-Chairman or the Board of Directors may from time to time determine.

**Section 4.11. Secretary.** The Secretary shall attend all meetings of the shareholders and of the Board of Directors, and of the Executive Committee of the Board and shall preserve in books of the Corporation true minutes of the proceedings of all such meetings. The Secretary shall safely keep the seal of the Corporation, and shall have authority to affix the same to all instruments where its use is required. The Secretary shall give all notices required by statute, by law, or resolution. The Secretary shall have charge of the stock certificate books, transfer books and stock ledgers of the Corporation whenever the same shall not be in the custody of any transfer agent of the Corporation, and shall keep or cause to be kept a stock ledger or ledgers containing the names and addresses of the shareholders of the Corporation and the number of shares held by them respectively. The Secretary may sign with the Chairman of the Board of Directors, the President, the Vice-Chairman, an Executive Vice President or an elected Vice



President, certificates for shares of the capital stock of the Corporation. The Secretary shall perform such other duties as may be delegated to the Secretary by the Board of Directors. In the absence of the Secretary or in the event of the Secretary's inability to act, the Secretary's duties shall be performed and the Secretary's powers may be exercised by the Assistant Secretaries, if any, in the order of their last election, or, in the event there are no Assistant Secretaries or, in their absence, such other officer as shall be designated by the President, Vice-Chairman or Secretary, or, failing such designation, by the Board of Directors.

**Section 4.12. Assistant Secretaries.** Each Assistant Secretary, if any, shall perform the duties of the Secretary, in case of the latter's absence or inability to act, and shall perform such duties and have such powers as may from time to time be assigned to each Assistant Secretary by the President, the Vice-Chairman or the Board of Directors. An Assistant Secretary may also sign certificates for shares of the capital stock of the Corporation.

**Section 4.13. Treasurer.** Except as the Board of Directors, President or Vice-Chairman may otherwise direct, the Treasurer shall have, or provide for, the custody of all of the funds and securities of the Corporation which may come into his hands, and shall collect and receive or provide for the collection and receipt of the monies due or paid to or held by the Corporation. The Treasurer shall deposit or cause to be deposited all of the funds in the Treasurer's custody in such bank or banks or depository or depositories as the Board may from time to time designate. When necessary or proper, the Treasurer may endorse on behalf of the Corporation for collection checks, notes and other obligations. The Treasurer shall sign or cause to be signed all receipts and vouchers for payments made to the Corporation. The Treasurer shall, alone or jointly with such other officer or officers as the Board may designate, sign all checks made by the Corporation. The Treasurer may sign with the President or such other person or persons as may be designated for the purpose by the Board of Directors all bills of exchange and promissory notes of the Corporation. The Treasurer may sign with the Chairman of the Board of Directors, the President, the Vice-Chairman, an Executive Vice President or an elected Vice President, certificates for shares of the capital stock of the Corporation.

Whenever required by the Board of Directors, the Treasurer shall render a statement of his cash account. The Treasurer shall enter or cause to be entered regularly in books of the Corporation, to be kept or caused to be kept by the Treasurer for the purpose, full and accurate accounts of all monies received and paid by the Treasurer on account of the Corporation. The Treasurer shall, at all reasonable times, exhibit the Treasurer's books and accounts to any Director of the Corporation upon application at the office of the Corporation during business hours. The Treasurer shall perform all acts incident to the position of Treasurer, subject to the control of the Board of Directors, and shall have such other powers and perform such other duties as may from time to time be assigned to the Treasurer by these By-Laws, by the Board of Directors, or by the President or Vice Chairman. In the absence of the Treasurer, or, in the event of the Treasurer's inability to act, the Treasurer's duties shall be performed by the Assistant Treasurers, if any, in

order of their last election, or, in the event there are no Assistant Treasurers, or in their absence, by such other officer as shall be designated by the President, the Vice-Chairman or Treasurer, or failing such designation, by the Board of Directors. Section 4.14. Assistant Treasurers. Each Assistant Treasurer, if any, shall perform the duties of the Treasurer, in the case of the latter's absence or inability to act, and shall perform such duties as the President, the Vice-Chairman or the Board of Directors may from time to time determine. An Assistant Treasurer may also sign certificates for shares of the capital stock of the Corporation.

**Section 4.15. Giving of Bond by Officers.** All officers of the Corporation required to do so by the Board of Directors shall furnish bonds to the Corporation for the faithful performance of their duties, with such penalties and with such conditions and security as the Board may require, the cost thereof to be paid by the Corporation.

## **ARTICLE V**

### **Stock Certificates**

**Section 5.01. Form; Signature.** The shares of the Corporation shall be represented by certificates. Every holder of stock shall be entitled to have a certificate signed by or in the name of the Corporation by the Chairman of the Board of Directors, the President, the Vice Chairman, an Executive Vice President or an elected Vice President, and by the Treasurer, an Assistant Treasurer, the Secretary or an Assistant Secretary of the Corporation representing the number of shares registered in certificate form. Any or all of the signatures on the certificate may be a facsimile. In case any officer, transfer agent, or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent or registrar before such certificate is issued, it may be issued by the Corporation with the same effect as if he were such officer, transfer agent or registrar at the date of issue.

**Section 5.02. Lost Certificates.** The Board of Directors may direct a new certificate or certificates of stock to be issued in place of any certificate or certificates theretofore issued by the Corporation alleged to have been lost, stolen or destroyed, upon the making of an affidavit of that fact by the person claiming the certificate of stock to be lost, stolen or destroyed. When authorizing such issue of a new certificate or certificates, the Board of Directors may, in its discretion and as a condition precedent to the issuance thereof, require the owner of such lost, stolen or destroyed certificate or certificates, or his legal representative, to give the Corporation a bond in such sum as it may direct as indemnity against any claim that may be made against the Corporation on account of the alleged loss, theft or destruction of any such certificate or the issuance of any such new certificate.

**Section 5.03. Transfers of Stock.** Upon surrender to the Corporation of a certificate for stock duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, cancel

the old certificate and record the transaction upon its books, provided that such transaction or transfer was effected in compliance with the restrictions on the transfer of shares set forth in the Certificate of Incorporation.

**Section 5.04. Registered Stockholders.** The Corporation shall be protected in treating the persons in whose name shares stand on the record of stockholders as the owners thereof for all purposes; and the Corporation shall not be bound to recognize any equitable or other claim to or interest in such shares on the part of any other person, whether or not it shall have express or other notice thereof, except as otherwise provided by law.

## **ARTICLE VI**

### **Miscellaneous**

**Section 6.01. Fiscal Year.** The fiscal year of the Corporation shall be the calendar year.

**Section 6.02. Seal.** The Corporation shall have a seal in such form as the Board of Directors shall approve. The seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any other manner reproduced.

**Section 6.03. Amendments.** These By-Laws may be altered, amended or repealed, and new By-Laws may be adopted, at any regular or special meeting of the stockholders or of the Board of Directors. Notice of such alteration, amendment or repeal shall be contained in the notice of any such special meeting.

## **ARTICLE VII**

### **Indemnification and Insurance**

**Section 7.01. Indemnification.** (a) The Corporation shall indemnify any person who was or is a defendant or is threatened to be made a defendant to any threatened, pending or completed action, suit or proceeding, including, without limitation, any counterclaim, whether civil, criminal, administrative or investigative (other than an action by or in the right of the corporation or any subsidiary of the Corporation) by reason of the fact that he is or was a director, officer, employee or agent of the Corporation, or is or was serving at the request of the Corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise (each such person being an "Indemnifiable Party"), against expenses (including attorneys' fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by him in connection with such action, suit or proceeding if he acted in good faith and in a manner he reasonably believed to be in, or not opposed to, the best interests of the Corporation or any subsidiary of the corporation, as the case may be, and, with respect to any criminal action or proceeding, had no reasonable cause to believe his conduct was unlawful. The termination of any action, suit or proceeding by judgment, order, settlement, conviction, or upon a plea of nolo contendere or its equivalent,

shall not, of itself, create a presumption that the person did not act in good faith and in a manner which he reasonably believed to be in or not opposed to the best interests of the corporation or any subsidiary of the Corporation, as the case may be, and, with respect to any criminal action or proceeding, had reasonable cause to believe that his conduct was unlawful.

(b) The Corporation shall indemnify any Indemnifiable Party who was or is a defendant or is threatened to be made a defendant to any threatened, pending or completed action or suit by or in the right of the Corporation or any subsidiary of the Corporation to procure a judgment in its favor by reason of the fact that he is or was an Indemnifiable Party against expenses (including attorneys' fees) actually and reasonably incurred by him in connection with the defense or settlement of such action or suit if he acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interests of the Corporation or of any subsidiary of the Corporation, as the case may be, and except that no indemnification shall be made in respect of any claim, issue or matter as to which such person shall have been adjudged to be liable to the Corporation or any subsidiary of the Corporation unless and only to the extent that the Court of Chancery of the State of Delaware or the court in which such action or suit was brought shall determine upon application that, despite the adjudication of liability but in view of all the circumstances of the case, such person is fairly and reasonably entitled to indemnity for such expenses which the Court of Chancery or such other court shall deem proper.

(c) To the extent that an Indemnifiable Party has been successful on the merits or otherwise in defense of any action, suit or proceeding referred to in Section 7.01(a) and (b) of these Restated By-laws, or in defense of any claim, issue or matter therein, he shall be indemnified against expenses (including attorneys' fees) actually and reasonably incurred by him in connection therewith.

(d) Any indemnification under Section 7.01(a) and (b) of these Restated By-laws (unless ordered by a court) shall be made by the Corporation only as authorized in the specific case upon a determination that indemnification of the director, officer, employee or agent is proper in the circumstances because he has met the applicable standard of conduct set forth in Section 7.01(a) and (b) of these Restated By-laws. Such determination shall be made (i) by the Board of Directors by a majority vote of a quorum consisting of directors who were not parties to such action, suit or proceeding, or (ii) if such a quorum is not obtainable, or, even if obtainable, a quorum of disinterested directors so directs, by independent legal counsel in a written opinion, or (iii) by the stockholders of the Corporation.

(e) Expenses (including attorneys' fees) incurred by an officer or director in defending any civil, criminal, administrative or investigative action, suit or proceeding may be paid by the Corporation in advance of the final disposition of such action, suit or proceeding upon receipt of an undertaking by or on behalf of such director or officer to repay such amount if it shall ultimately be determined that he is not entitled to be indemnified by the Corporation pursuant to this Article VII. Such expenses (including attorneys' fees) incurred by other employees and agents may be so paid upon such terms and

conditions, if any, as the Board of Directors deems appropriate.

(f) The indemnification and advancement of expenses provided by, or granted pursuant to, other Sections of this Article VII shall not be deemed exclusive of any other rights to which those seeking indemnification or advancement of expenses may be entitled under any law, by-law, agreement, vote of stockholders or disinterested directors or otherwise, both as to action in an official capacity and as to action in another capacity while holding such office.

(g) For purposes of this Article VII, references to "the Corporation" shall include, in addition to the resulting Corporation, any constituent Corporation (including any constituent of a constituent) absorbed in a consolidation or merger which, if its separate existence had continued, would have had power and authority to indemnify its directors, officers, employees or agents so that any person who is or was a director, officer, employee or agent of such constituent Corporation, or is or was serving at the request of such constituent Corporation as a director, officer, employee or agent of another Corporation, partnership, joint venture, trust or other enterprise, shall stand in the same position under the provisions of this Article VI with respect to the resulting or surviving Corporation as he would have with respect to such constituent Corporation if its separate existence had continued.

(h) For purposes of this Article VII, references to "other enterprises" shall include employee benefit plans; references to "fines" shall include any excise taxes assessed on a person with respect to an employee benefit plan; and references to "serving at the request of the Corporation" shall include any service as a director, officer, employee or agent of the Corporation which imposes duties on, or involves service by, such director, officer, employee or agent with respect to any employee benefit plan, its participants, or beneficiaries; and a person who acted in good faith and in a manner he reasonably believed to be in the interest of the participants and beneficiaries of an employee benefit plan shall be deemed to have acted in a manner "not opposed to the best interests of the Corporation" as referred to in this Article VI.

(i) The indemnification and advancement of expenses provided by, or granted pursuant to, this Article VII shall, unless otherwise provided when authorized or ratified, continue as to a person who has ceased to be a director, officer, employee or agent and shall inure to the benefit of the heirs, executors and administrators of such a person.

**Section 7.02. Insurance for Indemnification.** The Corporation may purchase and maintain insurance on behalf of any Indemnifiable Party, against any liability asserted against him and incurred by him in any such capacity, or arising out of his status as such, whether or not the Corporation would have the power to indemnify him against such liability under the provisions of Section 145 of the Delaware General Corporation Law."  
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**BASF Corporation**

**BASF**

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## NOL Corporate Structure

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Directors](#)

[Federal  
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### BASF Corporation

### Articles of Incorporation

#### AMENDED AND RESTATED CERTIFICATE OF INCORPORATION OF BASF CORPORATION

BASF CORPORATION, a Delaware corporation, HEREBY CERTIFIES AS  
FOLLOWS:

1. The name of the Corporation is BASF Corporation and the name under which the Corporation was originally incorporated is MEW Corporation. The date of filing of its original Certificate of Incorporation with the Secretary of State of the State of Delaware was August 11, 1977.
2. This Amended and Restated Certificate of Incorporation restates and integrates and further amends the Certificate of Incorporation of the Corporation by amending Articles THIRD through TENTH thereof.
3. The text of the Certificate of Incorporation as amended or supplemented heretofore is further amended to read as set forth in full on Annex A hereto.
4. This Amended and Restated Certificate of Incorporation was duly adopted by the written consent of the sole stockholder of the Corporation entitled to vote thereon in accordance with the provisions of Section 228, 242 and 245 of the General Corporation Law of the State of Delaware.

IN WITNESS WHEREOF, BASF Corporation has caused this Certificate to be signed by J. Dieter Stein, its President, and attested by Thomas Y. Allman, its Secretary, this 17th day of May, 1995.

BASF CORPORATION

By Signed J. Dieter Stein

Name: J. Dieter Stein

Title: President

ATTEST:

**844230154**

By Signed T.Y. Allman

BASF Corporation May 1, 2003  
Response to Request for Information

Name: T.Y. Allman

Title: Secretary

ANNEX A

AMENDED AND RESTATED  
CERTIFICATE OF INCORPORATION  
OF  
BASF CORPORATION

ARTICLE I

Name

The name of the corporation is BASF Corporation (the "Corporation").

ARTICLE II

Registered Office and Registered Agent

The address of the registered office of the Corporation in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle. The name of the registered agent of the Corporation at such address is The Corporation Trust Company.

ARTICLE III

Corporate Purpose

The purpose of the Corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of the State of Delaware (the "General Corporation Law").

ARTICLE IV

Capital Stock

The total number of shares of all classes of stock that the Corporation shall have authority to issue is 1,000, all of which shall be shares of Common Stock and all of which are without par value.

ARTICLE V

Directors

(1) Elections of directors of the Corporation need not be by written ballot, except and to the extent provided in the By-laws of the Corporation.

(2) To the fullest extent permitted by the General Corporation Law as it now exists and as it may hereafter be amended, no director of the Corporation shall be personally liable to the Corporation or its stockholders for monetary damages for breach of fiduciary duty as a director.

## ARTICLE VI

### Indemnification of Directors, Officers and Others

(1) The Corporation shall indemnify any person who was or is a defendant or is threatened to be made a defendant to any threatened, pending or completed action, suit or proceeding, including, without limitation, any counterclaim, whether civil, criminal, administrative or investigative (other than an action by or in the right of the Corporation or any subsidiary of the Corporation) by reason of the fact that he is or was a director, officer, employee or agent of the Corporation or any subsidiary of the Corporation, or is or was serving at the request of the Corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise (each such person being an "Indemnifiable Party"), against expenses (including attorneys' fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by him in connection with such action, suit or proceeding if he acted in good faith and in a manner he reasonably believed to be in, or not opposed to, the best interests of the Corporation or any subsidiary of the Corporation, as the case may be, and, with respect to any criminal action or proceeding, had no reasonable cause to believe his conduct was unlawful. The termination of any action, suit or proceeding by judgment, order, settlement, conviction, or upon a plea of nolo contendere or its equivalent, shall not, of itself, create a presumption that the person seeking indemnification did not act in good faith and in a manner which he reasonably believed to be in or not opposed to the best interests of the Corporation or any subsidiary of the Corporation, as the case may be, and, with respect to any criminal action or proceeding, had reasonable cause to believe that his conduct was unlawful.

(2) The Corporation shall indemnify any Indemnifiable Party who was or is a defendant or is threatened to be made a defendant to any threatened, pending or completed action or suit, including, without limitation, any counterclaim, by or in the right of the Corporation or any subsidiary of the Corporation to procure a judgment in its favor by reason of the fact that he is or was an Indemnifiable Party against expenses (including attorneys' fees) actually and reasonably incurred by him in connection with the defense or settlement of such action or suit if he acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interests of the Corporation or any subsidiary of the Corporation, as the case may be, and except that no indemnification shall be made in respect of any claim, issue or matter as to which such person shall have been adjudged to be liable to the Corporation or any subsidiary of the Corporation unless and only to the extent that the Court of Chancery of the State of Delaware or the court in which such action or suit was brought shall determine upon application that, despite the adjudication of liability but in view of all the circumstances of the case, such



person is fairly and reasonably entitled to indemnity for such expenses which the Court of Chancery or such other court shall deem proper.

(3) To the extent that an Indemnifiable Party has been successful on the merits or otherwise in defense of any action, suit or proceeding referred to in Sections (1) and (2) of this Article VI, or in defense of any claim, issue or matter therein, he shall be indemnified against expenses (including attorneys' fees) actually and reasonably incurred by him in connection therewith.

(4) Any indemnification under Sections (1) and (2) of this Article VI (unless ordered by a court) shall be made by the Corporation only as authorized in the specific case upon a determination that indemnification of the director, officer, employee or agent is proper in the circumstances because he has met the applicable standard of conduct set forth in such Sections (1) and (2). Such determination shall be made (a) by the Board of Directors of the Corporation by a majority vote of a quorum consisting of directors who were not parties to such action, suit or proceeding, or (b) if such a quorum is not obtainable, or, even if obtainable, a quorum of disinterested directors so directs, by independent legal counsel in a written opinion, or (c) by the stockholder of the Corporation.

(5) Expenses (including attorneys' fees) incurred by an officer or director in defending any civil, criminal, administrative or investigative action, suit or proceeding may be paid by the Corporation in advance of the final disposition of such action, suit or proceeding upon receipt of an undertaking by or on behalf of such director or officer to repay such amount if it shall ultimately be determined that he is not entitled to be indemnified by the Corporation as authorized in this Article VI. Such expenses (including attorneys' fees) incurred by other employees and agents may be so paid upon such terms and conditions, if any, as the Board of Directors of the Corporation deems appropriate.

(6) The indemnification and advancement of expenses provided by, or granted pursuant to, the other sections of this Article VI shall not be deemed exclusive of any other rights to which those seeking indemnification or advancement of expenses may be entitled under any law, by-law, agreement, vote of stockholder or disinterested directors or otherwise, both as to action in an official capacity and as to action in another capacity while holding such office.

(7) The Corporation may purchase and maintain insurance on behalf of any person who is or was a director, officer, employee or agent of the Corporation, or is or was serving at the request of the Corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise against any liability asserted against him and incurred by him in any such capacity, or arising out of his status as such, whether or not the Corporation would have the power to indemnify him against such liability under the provisions of Section 145 of the General Corporation Law.

(8) For purposes of this Article VI, references to "the Corporation" shall include, in addition to the resulting corporation, any constituent corporation

(including any constituent of a constituent) absorbed in a consolidation or merger which, if its separate existence had continued, would have had power and authority to indemnify its directors, officers, employees or agents so that any person who is or was a director, officer, employee or agent of such constituent corporation, or is or was serving at the request of such constituent corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise, shall stand in the same position under the provisions of this Article VI with respect to the resulting or surviving corporation as he would have with respect to such constituent corporation if its separate existence had continued.

(9) For purposes of this Article VI, references to "other enterprises" shall include employee benefit plans; references to "fines" shall include any excise taxes assessed on a person with respect to an employee benefit plan; references to "serving at the request of the Corporation" shall include any service as a director, officer, employee or agent of the Corporation which imposes duties on, or involves service by, such director, officer, employee or agent with respect to any employee benefit plan, its participants or beneficiaries; references to a "subsidiary" of the Corporation shall include any corporation, partnership, joint venture, or limited liability company of which (or in which) more than 50% of (a) the issued and outstanding capital stock having ordinary voting power to elect a majority of the Board of Directors of such corporation or (b) the interest in the capital or profits of such partnership, limited liability company or joint venture is at the time directly or indirectly owned or controlled by the Corporation, by the Corporation and one or more of its other subsidiaries or by one or more of the Corporation's other subsidiaries; and a person who acted in good faith and in a manner he reasonably believed to be in the interest of the participants and beneficiaries of an employee benefit plan shall be deemed to have acted in a manner "not opposed to the best interests of the Corporation" as referred to in this Article VI.

(10) The indemnification and advancement of expenses provided by, or granted pursuant to, this Article VI shall, unless otherwise provided when authorized or ratified, continue as to a person who has ceased to be a director, officer, employee or agent and shall inure to the benefit of the heirs, executors and administrators of such a person.

## ARTICLE VII

### By-Laws

The directors of the Corporation shall have the power to adopt, amend or repeal by-laws.

## ARTICLE VIII

### Amendment

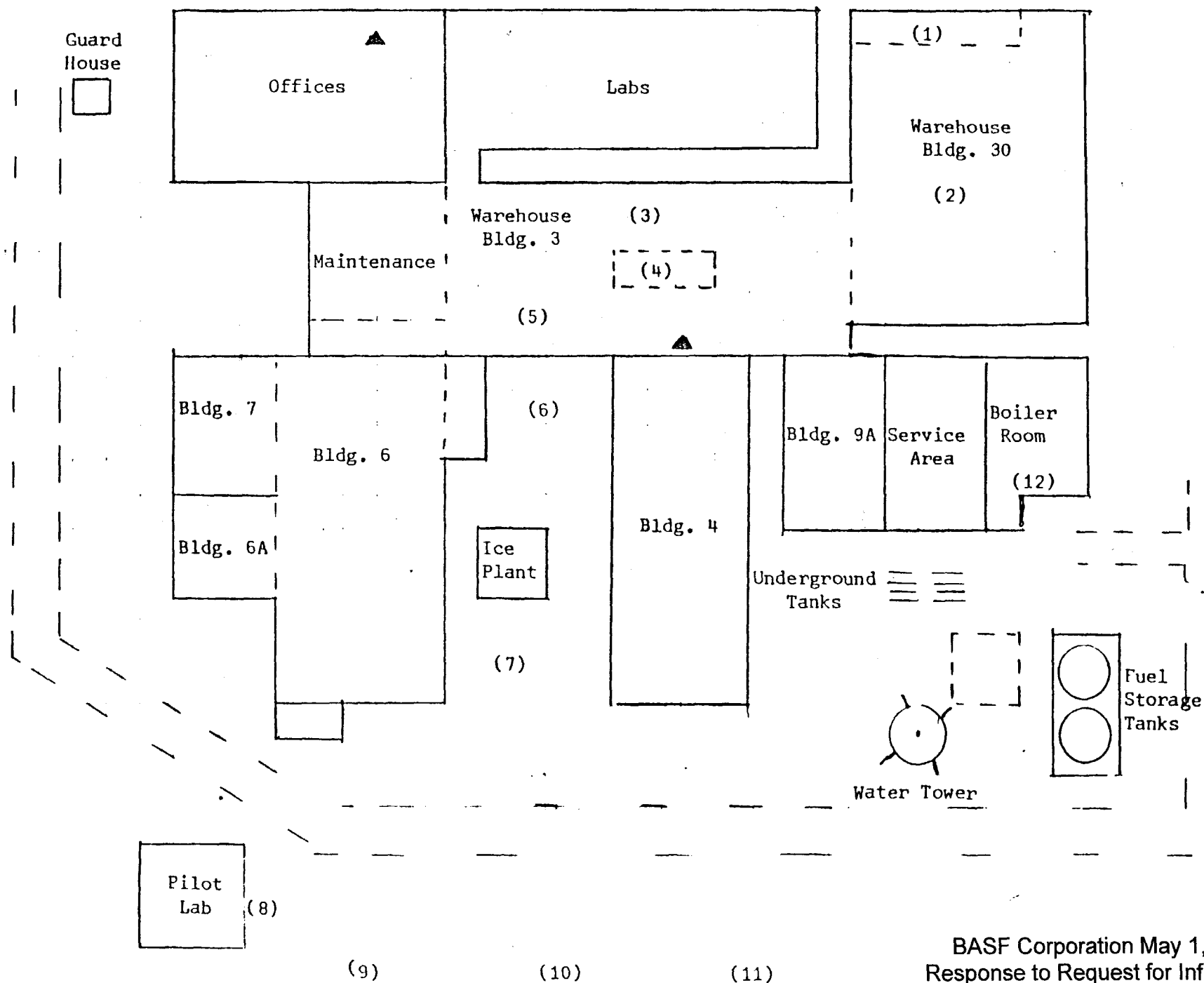
The Corporation reserves the right to amend, alter, change or repeal any provision of this Certificate of Incorporation, in the manner now or hereafter

prescribed by law, and all rights conferred on stockholders in this Certificate of Incorporation are subject to this reservation.

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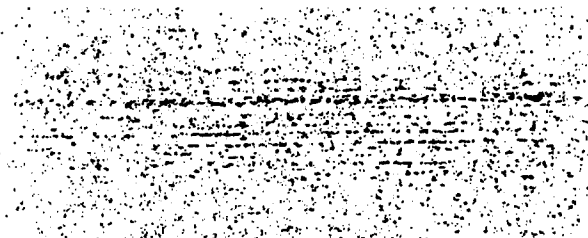
Drum Storage Areas



844230160

▲ Designates Spill Control Pallets

THIS MAP CAN BE FOUND IN THE SITE FILE LOCATED AT: U.S. EPA SUPERFUND RECORDS  
CENTER, 290 BROADWAY, 18<sup>TH</sup> FLOOR, NY, NY 10007

VM			BASF Corporation May 1, 2003 Response to Request for Information	
Date	Location	Drawn		
2.3035.5				

844230161

**Site History  
Former Inmont Facility  
150 Wagaraw Rd  
Hawthorne, New Jersey**

***Prepared for:***

**United Technologies Corporation  
United Technologies Building, MS 507  
Hartford, Connecticut**

**May 29, 1992**

BASF Corporation May 1, 2003  
Response to Request for Information

**Baker**

**Baker Environmental, Inc.**

**Princeton, New Jersey**

**844230162**

**Baker**

**Baker Environmental, Inc.**  
Princeton Commerce Center  
Building C, 29 Emmons Drive  
Princeton, New Jersey 08540

(609) 987-6900  
FAX (609) 243-0558

May 29, 1992

Mr. Troy J. Charlton  
United Technologies Corporation  
United Technologies Building, MS 507  
Hartford, Connecticut 06101

Subject: **Submission of Site-History Compilation for the Former Inmont Facility  
Located at 150 Wagaraw Road, in Hawthorne, New Jersey**

Dear Troy:

Please find attached Baker Environmental, Inc.'s (Baker's) Site-History Compilation for the subject facility. Pursuant to your request, this compilation was developed following extensive review of background information contained within the following files and/or sources of information:

- ▶ McLaren-Hart, Inc. project files;
- ▶ United Technology Corporation (UTC) project files (in-house);
- ▶ Calgon Corporation files maintained by New Jersey Department of Environmental Protection and Energy's (NJDEPE's) Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA); and New Jersey Geological Survey (NJGS) (archive);
- ▶ former Inmont Corporation files maintained by NJDEPE's BEECRA and NJGS (archive);
- ▶ BASF Corporation files maintained by NJDEPE BEECRA and NJGS (archive files);
- ▶ UTC files maintained by NJDEPE BEECRA and NJGS (archive files); and
- ▶ Borough of Hawthorne's Water Department files.

**844230163**

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Former Inmont Facility

150 Wagaraw Road  
Hawthorne, New Jersey

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**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1923 - 1969**

<u>DATE</u>	<u>Description</u>
1923	
August 31	A notation from A. Evans, Master Mechanic for the Weidman Silk Dyeing Co., Paterson, New Jersey, stated that forty seven (47) wells existed in the vicinity of the site. The wells were 10 inches in diameter and averaged 300 feet deep. He mentioned that the Passaic River wells exhibited a gaseous smell (possibly due to nearby gas works) and many had been abandoned. Total pumping rate for the operating wells was 5,000,000 gallons per day (gpd). Water levels were usually 25 feet below surface and drawdowns reached 50 feet (during pumping). The wells were utilized for dyeing, weighing, washing, and drinking; water quality was insufficient for boiler use. The wells were overhauled in 1922 because the pipes were corroded and rusted (in operation since 1911). The water supply quality was noted as good subsequent to the overhaul.
August 31	<p>A report to Hawthorne Water Department (HWD) from Mr. Evans, P.I., of Hawthorne, contained information on five wells. All five wells were 450 feet deep and 10-inches in diameter. One well was capable of yielding 550 gpm with a drawdown of 28 feet, and was suspected of being capable of a greater yield. Another well was not operated, since it only yielded 50 gpm. The last three wells provided approximately 125 gpm. The water pumped from the wells were transferred into a 550,000 gallon concrete reservoir.</p> <p>A handwritten notation at the bottom of the report indicates that a W.S. Application [sic], 286, dated August 19, 1927 listed 5 wells. Three wells were 10-inches in diameter and were 300 feet deep; two wells were 14-inches in diameter and 325 feet deep. The five wells had a dry season total yield of 800,000 gpd.</p> <p>Two forms (G98-5c-2-25) which outlined well construction and yield (summarized above) accompanied the report. One section noted that bedrock was 30 feet below ground surface (bgs) on the south side of the Passaic River and 18 to 20 feet bgs on the (northern) side of the river in the vicinity of the site. It also noted that groundwater flow was from the northwest to the southeast.</p>
1927	A publication edited by A. Heusser titled, " <i>The History of the Silk Dyeing Industry in the United States</i> ", summarizes the general history of the area including a summary of the previous thirty years of Weidman Silk Dyeing Company's expansion. The chronology of this expansion/development was described as follows:

<u>Date</u>	<u>Description</u>
1894	Tin recovery;
1897	Manufacture and recovery of soap, testing of logwood extracts and crystals, manufacture of phosphate of soda;
1898	Introduction of fast dyes;
1899	Construction of new chemical works;
1901	The installation of two "lime-soda" water softeners;
1905	The construction of a tunnel beneath the tracks of the Erie Railroad to provide a connection between the chemical works and the dye house, and the construction of a tin-recovery basin;
1907	Installation of 5 Hungerford 1-million-gallon water filters;
1908	Use of anhydrous tetrachloride of tin for weighing;
1910	Purchase of the "North Tract" across the Passaic at Hawthorne, including the De Gray Homestead (site of UTC/BASF Inmont);
1911	Permutit water softening system;
1912	Cable ash conveyor stretched across Passaic River to Hawthorne property; laying of track for handling ashes from boiler house to conveyor; drilling of seventeen additional artesian wells north of Wagaraw Road in Hawthorne;
1911	Adoption of oil-extracting machinery;
1920	Construction of fuel oil tanks on the Hawthorne tract.
 1940	 The Calgon plant (adjacent to the Inmont site) manufactured and processed mercury. In addition Calgon recovered elemental mercury from used military batteries. Battery casings were disposed of on the property. (Memorandum, 8/15/84).
 1946	 
 July 2	 Interchemical (now known as Inmont) purchased the property from E. Betts and A. Gilmore (a partnership) and G. Betts and G. Gilmore. Nine production wells used by Weidman Silk Dyeing Company water-supply system were located on the Inmont property (Lan Associates, GIS and SES, 1985).
	 The Weidman Silk Dyeing Company installed 47 bedrock wells in the vicinity of the Inmont facility between 1910 and 1912. The wells, ranging in depth from 300 to 400 feet, supplied a total of 4 million gpd of water to the Weidman Silk Dyeing Company. The wells were used for manufacturing and drinking water purposes until the late 1950's when Weidman Silk converted to public water

<u>Date</u>	<u>Description</u>
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supply. Apparently, some of the Weidman Silk Dyeing Company bedrock wells became part of the Hawthorne Borough Municipal Well Field (Hart, 1990).

Nine of the Weidman Silk Dyeing Wells are located on Inmont facility property. Wells RW-2 and RW-4 are currently being used as groundwater monitor wells at the Inmont site. The other seven wells were located by Hart using magnetic surveys; the wells were abandoned in early 1990 (Personal communication, P. Lawrence, Hart Associates), although records for only three of the wells can be documented.

Note: Geraghty & Miller stated that the presence of plasticizers and phthalate esters found during its 1982 groundwater investigation, was attributed to the Weidman Company, since these substances were not commonly used in Inmont processes.

No industrial development existed at the Interchemical property before 1946. A cemetery was located in the southwest corner of the parcel.

1950

Interchemical constructed buildings No. 4 and No. 6 to house the major pigment and dyestuff operations. The buildings were constructed to consolidate the manufacturing activities of Aridye (of Fair Lawn), Lyon's Piece & Dye, and Phoenix Dye Works (of Patterson). This plant location became the primary pigment and dye manufacturing facility for Interchemical.

Manufacturing operations in building No. 6 predominantly consisted of water-based dispersions and dyes, such as fluorescein, quinizarin blue dyes, eosine, and copper 8 hydroxyquinoline. Fluorescein was produced by reacting resorcinol and phthalic anhydride in zinc chloride; eosine was manufactured by brominating fluorescein in methanol.

The construction of the original facility included the installation of two tank farms. Tank Farm No.1 consisted of 13 underground storage tanks (USTs) with 23 compartments. Tank Farm No.2 contained 16 underground storage tanks (USTs). Historical uses of the original tanks, and other USTs subsequently installed, are provided in Tables 1 and 2. (Lan Associates, GIS & SES, 1985).

1956

Interchemical constructed a pilot plant located in building No. 25 (now abandoned).

Tank Farm No.1: Underground Storage Tank Usage, Inmont-Hawthorne Plant, New Jersey.

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985 (Lan Associates)	Notes
1	1950	5000	Reclaimed Alcohol	Reclaimed Alcohol	Sludge	Removed	
2	1950	5000	Alcohol	Reclaimed Alcohol	Sludge	Removed	
3	1950	5000	Isopropanol	Isopropanol	Isopropanol	Removed	
4	1950	5000	Ammonia	Ammonia	Empty	Removed	
5	1950	5000	Methanol	Methanol	Methanol	Removed	
6	1964	6000	Filtrate	Vat Yellow Filtrate	Empty	Removed	Vat Yellow pigment is associated with 1-Amino anthraquinone, phthalyl chloride, nitrobenzene, and methanol
7	1964	5000	Nitrobenzene	Nitrobenzene	Empty	Removed	
8	1964	5000	Methylene Chloride	Methylene Chloride	Empty	Removed	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985.

BAKER ENVIRONMENTAL 04-92

844230170

Tank Farm No.1 Continued:

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985 (Lan Associates)	Notes
9	1964	15,000	Monomer	Methanol	Empty	Removed	Monomer = styrene monomer (?)
10	1964	5000	Recovered Methanol	Recovered methanol	Empty	Removed	
11	1964	5000	Trichloro-benzene	Trichloro-benzene	Empty	Removed	
12	1964	5000	Toluene	Toluene	Empty	Removed	
13	1964	5000	Spare	Orthodichloro-benzene	Empty	Removed	
14	1964	5000	Dichlorobenzene	Nitrobenzene	Empty	Removed	
15	1964	5000	Isopropanol Amine	Nitrobenzene	Empty	Removed	
16	1964	5000	Spare	ODCB filtrate	Empty	Removed	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985.

BAKER ENVIRONMENTAL 04-92

844230171

Tank Farm No.1 Continued:

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985 (Lan Associates)	Notes
17	1969	10,000	Empty	Caustic	Caustic	Removed	
18	1969	5000	Nitro Rich Vat Yellow Filtrate	Empty	Empty	Removed	
19	1969	5000	Alcohol Rich Vat Yellow Filtrate	Empty	Empty	Removed	
20	1969	5000	Cellosolve	Empty	Empty	Removed	
21	1969	10,000	Nitro Rich Vat Yellow Filtrate	Empty	Empty	Removed	
22	1969	10,000	Alcohol Rich Vat Yellow Filtrate	Empty	Empty	Removed	
23	1969	5000	Empty	Empty	Ammonia	Removed	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985.

BAKER ENVIRONMENTAL 04-92

844230172



Table 2: Tank Farm No.2, Underground Storage Tank Usage, Inmont-Hawthorne Plant, New Jersey.

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985	Notes
29	1950	15,000	Turpentine	Solvenol 226	Solvenol 226	Empty	
30	1950	15,000	Solvesso 100	Solvesso 100	Solvesso 100	Empty	
31	1950	13,500	Melamine	Resimeme K896	Resimeme K896	Empty	Resimeme K896 = petroleum hydrocarbon
32	1950	13,500	Pine Oil	Pine Oil	Pine Oil	Empty	
33	1950	10,000	Octyl Alcohol	Octyl Alcohol	Octyl Alcohol	Magie 470 Oil	Magie Oil = petroleum hydrocarbon
34	1950	10,000	Solvesso 100	Solvesso 150	Mineral Oil	Empty	
35	1957	7500	Mineral Oil	470 Oil (Magie?)	Magrisol 52	Magie 500 Oil	
36	1957	2500	Ink Oil	Aquasol GS	Magrisol 52	Magie 500 Oil	Ink Oil = Petroleum distillate
37	1957	5000	Xylene	Xylene	Xylene	Xylene	
38	1957	5000	Varsol	Varsol #2	Varsol #2	Empty	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985.

BAKER ENVIRONMENTAL 04-92

Table 2 Continued:

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985	Notes
39	1957	10,000	Spare	Solvenol 226	Empty	Empty	
44	1969	5000		440 Oil	Hydrosol 47	Magie 470 Oil	
45	1969	5000		Vaporin Sol'N 0431	Gulf 896 Oil	Empty	
46	1969	10,000		Empty	Empty	Empty	
47	No Data	6000				Waste Xylene	
48	No Data	1000			Heat Transfer Oil	Empty	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985

BAKER ENVIRONMENTAL 04-92

<u>Date</u>	<u>Description</u>
1964	Interchemical constructed additional USTs in the area of Tank Farm No. 1 (Table 1).
1967	<p>Building No. 5 was constructed at the Interchemical facility to house solvent-based dyestuff reactions. Manufacturing operations were conducted both inside and outside the building which included the manufacture of styrene acrylate and quinizarin (1,4 dihydroxyanthraquinone, a major dye component). The largest product, by volume, that Inmont produced was styrene acrylate (Lan Associates, GIS/SES, 1985).</p> <p>Pigment and dyestuffs produced in Building 5 included vat yellow, phthalocyanine blue crude, dioxazine violet crude, phthalocyanine green crude, brown y pigment, quinizarin, mapo (methyl aziridenyl phosphine oxide), mapc (3-amino, 4 methyl benzamide), iso-propylamine sulfate, AR series, styrene acrylate, and iron oxide slurry. These pigments, intermediates, colorless compounds and dyestuffs involved compounds such as nitrobenzene, 1-amino anthraquinone, phthalyl chloride, phthalic anhydride, trichlorobenzene, methanol, chloranil, orthodichlorobenzene, copper phthalocyanine crude blue, diazotize aniline, beta naphthol, methylene chloride, and many others.</p> <p>In general, the pigments were associated with lead, chromium, and the flush base concentrates contained hydrocarbons, xylene, and barium.</p> <p>During operations, a number of 55-gallon drums containing sulfuric acid were buried behind Building No. 5 which were leaking when discovered. The exact date of drum burial or quantity of material that leaked could not be determined.</p> <p>The process of drowning (ice and water quenching) quinizarin was also conducted outside Building No. 5. Product and associated by-products, including sulfuric acid and phthalic acid, are thought to have spilled in this area.</p> <p>Manufacturing of some organic chemicals at the Interchemical facility was discontinued in 1967 (Hart,1990).</p>
1969	Additional USTs were installed at the Interchemical facility in both tank farm areas (Tables 1 and 2).

1970 - 1979

844230176

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1970 - 1979**

**844230177**

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period 1970 - 1979

<u>Date</u>	<u>Description</u>
1974	Manufacture of dyestuff at Inmont discontinued.
1975	Building No.5 was demolished after operations involving dyestuff reactions discontinued.
1976	Pigment dispersion operations conducted at building No. 4 ceased.
1977	
March 21	Approximately 400 gallons of No. 6 fuel oil was spilled at the Inmont facility. Two open safety valves on a fuel oil holding tank (an above-ground storage tank (AST) having a capacity of 20,000 gallons) permitted the oil to overflow during filling operations. The spill reached a drainage trench; booms were set up in the trench, preventing the oil from reaching the Passaic River. Standard Spill, Inc. was retained to vacuum the spilled fuel oil from the trench and clean the banks of the trench. The location of the AST was not noted.
March 23	Inmont was issued an OSHA violation for decontamination procedures of reactor vessels. The procedures were described as inadequate for the removal of 3,3'-dichlorobenzidine (and its salts) from the surfaces of the reactor vessels in the regulated area. The problem was labeled as a serious violation (Lan Associates, GIS, 1985). The violation was later challenged by UTC, and resulted in an extension of the abatement date to October 1, 1980.
November 21	E. Grich, Sanitary Chemist, reported to R. Snyder, Borough of Hawthorne, that a phenol concentration of 2.0 parts per billion (ppb) was detected in a sample collected on November 18, 1977 from the Wagaraw Road water treatment plant's bottom-filter effluent.
1978	
May 23	Approximately 200 gallons of No.6 fuel oil spilled from an above ground storage tank into its containment area at the Interchemical Facility. Clean Venture, Inc. was retained to remediate the spill. A second spill of No.6 fuel oil was also reported on this day. Oil from the spill flowed into a drainage trench. A boom was placed at the end of the trench to prevent the oil from entering the Passaic River. The oil was recovered from the trench.

Date                      Description

August 8                      An unknown quantity of paint was discharged from the Interchemical plant to an on-site drainage trench. A boom was setup to prevent migration of the paint; the paint was removed from the trench by skimming. The final cleanup of the paint spill was inspected by the United States Environmental Protection Agency (USEPA) and was reported to be satisfactory.

**1979**

United Technologies Corporation (UTC) acquired the Interchemical (Inmont) Corporation (Hart, 1990).

January 17                      In a New Jersey Department of Environmental Protection (NJDEP) Internal Memorandum, Dennis Schwab documented a site visit to sample municipal wells 10, 11, and 12 (South Wagaraw Road well field) for volatile organic compounds. He discovered that the well field is a 25-acre tract of land bordering the Passaic River which was formerly owned by the Weidman Silk Dying Company in the early 1900's. The property was sold to the Hawthorne Water Company (HWD), the Calgon Chemical Company, and the Interment [sic] Chemical Company. D. Schwab mentioned that the subject property had been used as a landfill; in the 1920's a gas works plant was located on this tract.

There were approximately 50 wells located on the 25-acre tract. Twenty seven (27) wells were owned by the Hawthorne Water Department (HWD) of which well nos. 10, 11, and 12 were in operation. These three wells were approximately 100 feet apart. The remaining wells were sealed and abandoned. D. Schwab noticed that when well no. 12 was shut off, the water in well no. 11 turned dark brown.

D. Schwab met with Mr. Jecker, Calgon Plant Manager. Three Weidman wells were located on the Calgon property, but were buried during landfilling.

D. Schwab located four of the seventeen wells on the Interment [sic] Chemical property. One well, which was capped, was located in the middle of an underground chemical storage tank area.

D. Schwab concluded that the wells on the 25 acre tract are interconnected and influence one another. He also suspected that surface water was leaching into some of the wells.

<u>Date</u>	<u>Description</u>
	D. Schwab observed red liquid discharging into the Passaic River from an area associated with numerous 55-gallon drums located behind the Calgon Plant near a stream.
February 22	<p>Internal NJDEP memorandum from Bill to John. The following facts were determined by telephone conversation with Ron Tatham from the HWD and David Sweet from US&amp;E [sic]:</p> <p>R. Tatham: Hawthorne municipal well no. 15 was abandoned because of high organic compounds. Municipal well nos. 10, 11, and 12 contained high amounts of iron bacteria prior to installation of the treatment plant.</p> <p>D. Sweet: Analysis of runoff indicated the presence of mercury in the Hawthorne Borough municipal wells. Mercury was not detected in well no. 10 from an analysis conducted on November 8, 1978. The memorandum also notes that well nos. 10, 11, and 12 are located in former mercury disposal areas.</p> <p>A toxic organic dioxin-related compound, 2,4,5 trichlorophenol was detected in some collected samples. The state laboratory which performed the analysis was unable to test for this compound previously.</p>
March 1	J. Wilford, Assistant Director of the Division of Water Resources (DWR), informed R. Snyder, Director of the HWD, that trichlorethane (TCA) was detected in numerous wells in the Wagaraw Road well field and well no. 10 located in the South Wagaraw Road well field. Weekly interval sampling of the treatment plant effluent was required for the following volatile organic compounds: trichloroethane, trichloroethylene and tetrachloroethylene. The plant treated water which was pumped from the North Wagaraw and South Wagaraw Road well fields.
March 13	A spill of 5-gallons of red colorant (9% Red Lake C) was reported in Building No. 9A at the Inmont facility. The red pigment was found on the banks of the drainage trench and subsequently cleaned by maintenance personnel.
March 15	<p>An unknown quantity of No.6 fuel oil overflowed from an AST into a surrounding containment area at the Inmont facility.</p> <p>A New Jersey Pollution Discharge Elimination System (NJPDES) compliance inspection revealed a number of non-compliance issues:</p>



<u>Date</u>	<u>Description</u>
	<ul style="list-style-type: none"><li>• Discharge D001 showed excessive chemical oxygen demand (COD), oil and grease. The inspector noted significant traces of oil at the discharge point;</li><li>• The storm drain near the pilot plant building was a potential source of [environmental] chemical contamination;</li><li>• The storm drain located at the garbage unloading dock showed significant traces of chemical runoff; and</li><li>• COD and color limits were violated on several occasions.</li></ul>
March 19	E. Grich, Sanitary Chemist, notified R. Snyder, HWD, that phenol was detected at a concentration of 3.2 ppb in a sample collected on March 16, 1979 from the Wagaraw Road water treatment plant bottom-filter effluent.
April 23	E. Grich informed R. Snyder that phenol was not detected in a sample collected on April 20, 1979 from the Wagaraw Road water treatment plant bottom-filter effluent.
September 11	P. Lynch, Manager of the Passaic-Hackensack Basin Water Pollution Control Monitoring, Surveillance and Enforcement Element, provided a summary of the initial phases of the HWD well contamination investigation to the Mayor of Hawthorne. An investigation of approximately forty facilities within a 3,000 foot radius of the affected wells was conducted. Six businesses were identified as users of the subject organic compounds; no obvious spills were noted at any of the facilities. The investigation concluded that organic contamination detected in the well system was the result of intermittent discharges to the groundwater over an extended period of time.
October 4	NJDEP Division of Water Resources (DWR) informed Hawthorne's Mayor and Council that the discovery of various organic compounds in certain potable water wells in the Borough initiated an investigation into possible sources of the contamination. A survey was conducted of forty industrial and commercial facilities located within a 3,000 foot radius of the affected wells. No evidence of organic-compound containing continuous point source discharges to the groundwater or surface water were discovered. Based on the information gathered up to September 11, 1979, NJDEP concluded that the organic contamination of certain Borough potable wells was the result of numerous intermittent discharges to the groundwater over an extended period.

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period 1970 - 1979

<u>Date</u>	<u>Description</u>
October 9	P. Lynch, Manager of the Passaic-Hackensack Basin Water Pollution Control, identified six industries located within a 3,000 foot radius which used similar compounds identified in the Borough wells. The Borough of Hawthorne's Mayor and Council were informed of this finding.
October 16	J. Hroncich, Assistant Environmental Engineer for the NJDEP Bureau of Potable Water, notified HWD for its failure to respond to the requirements outlined in the August 8, 1979 inspection report.
December 28	J. Hroncich, Assistant Environmental Engineer, Bureau of Potable Water, reported to Haig Kasabach, Groundwater Management and Peter Lynch, Passaic-Hackensack Basin, the results of sampling conducted at the Hawthorne Water Department. Mercury was detected at concentrations greater than 2.0 ppb at the Grand Avenue well, and was also detected in the Wagaraw Road wells 5, 8, and 10, Maitland Avenue well, Cedar Avenue well, and the treatment plant. Volatile organic compounds detected in Wagaraw Road well nos. 3, 6, 8, and 11 included: trichloroethylene, tetrachloroethylene, chlorobenzene, 1,1 dichloroethane, 1,2 dichloroethylene, 1,1,1 trichloroethane, chloroform, and 1,1 dichloroethylene.

1980 - 1985

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**1980**

December 3 P. Lynch, Manager of the Passaic-Hackensack Basin Water Pollution Control informed R. Barg, Chief of the Bureau of Potable Water of a consultant's report which reached several conclusions regarding the condition of the well field. The conclusions were: a hydraulic interconnection between the overburden and the bedrock aquifer exists; mercury and chlorinated hydrocarbons were detected in Calgon's monitor wells; mercury was reaching the bedrock aquifer in low concentrations (2 to 10 ppb); the origin of organic chemical contamination may originate from the Calgon property; and the majority of Hawthorne's drinking water was from the bedrock aquifer.

**1981**

February 19 T. Harrington, the Supervisor of Field Operations, Region I, Enforcement & Regulatory Services Element informed A. Brokaw, Commissioner, Hawthorne Water Department that the inspection of his department revealed that the HWD was in compliance with state requirements.

March 3 T. Harrington informed A. Brokaw, that laboratory results of water samples collected at the treatment plant, Triangle Diner, Wagaraw Road, and Goffel Road exceeded State Potable Water Standards for Iron and Manganese. The Borough of Hawthorne was required to respond to the violation within 14 days.

April 29 T. Harrington notified A. Brokaw that the HWD failed to respond to the March 3 directive. He again requested a response within 14 days.

December 10 R. Barg, Chief of the Bureau of Potable Water notified A. Brokaw that high concentrations of organic chemicals, consisting mainly of trichloroethylene and 1,1,1 trichloroethane, were detected in the municipal well(s). He requested well nos. 10, 11, and 12 in the South Wagaraw Road well field be shut-down.

**1982**

January 15 F. Lembo, Supervisor of Public Works for the Borough of Hawthorne, informed NJDEP DWR of the Borough's procedures for addressing organic chemical contamination of several Borough wells. He stated that municipal wells nos. 10, 11, and 12 were out of service and well nos. 3, 4, 5, 6, 7 and 8 were being monitored on a weekly basis.

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period 1980 - 1985

- February 24 NJDEP DWR, held a meeting with Inmont to address the issue of chlorinated solvents in the Hawthorne Municipal Well(s).
- March 26 Approximately 3,000 gallons of No.6 fuel oil was released from an above ground storage tank (AST) into a containment area at the Inmont facility. Olson and Hassold was retained to cleanup the spill.
- Twelve (12) to fifteen (15) drums containing an oil/water mixture were reported to have overflowed near the old maintenance shop during a rainstorm.
- March 29 E. Grich, Sanitary Chemist, informed R. Snyder, Borough of Hawthorne, that phenol was detected at a concentration of 3.6 ppb in a water sample collected on March 26, 1982 from the Wagaraw Road water treatment plant bottom-filter effluent.
- April 7 Geraghty & Miller (G&M) submitted a groundwater sampling plan to NJDEP outlining the sampling and analysis of two existing Wiedman wells located at the Inmont facility.
- May 3 R. Tatham, HWD, notified V. Monaco of the Bureau of Potable Water that there appeared to be a steady decline of volatile organics in the Hawthorne water supply.
- May 19 R. Barg, Chief for the Bureau of Potable Water informed R. Tatham that the decrease in total VOC concentration (detected in the wells) permitted operation of the South Wagaraw well field and the North Wagaraw well field.
- May 25 The G&M sampling plan for the Inmont facility was approved by NJDEP DWR. NJDEP DWR's stipulation for the approved plan involved the construction of two 2-inch monitor wells and that the four (monitor) wells on the Inmont property and municipal wells be sampled and analyzed for priority pollutant analyses.
- June 11 A. Schiffman, Director of NJDEP, notified A. Brokaw that the municipal water facility received a rating of "conditionally unacceptable". Deficiencies noted during the inspection were: insufficient sampling program, and absence of a screened casing vent.
- June 29 R. Tatham, HWD, informed V. Monaco of the Bureau of Potable Water that the municipal wells would be sampled on a weekly basis. In addition, a search would be conducted of facilities using chloroethyevinyl ether and any recent spills. This compound was detected in the municipal well(s).

November 17 P. Lynch, Chief of NJDEP's Region I Enforcement Element notified the Hawthorne Water Department that it was delinquent in submitting bacteriological sampling results.

December G&M completed the preliminary Inmont groundwater investigation and submitted a report to NJDEP DWR. G&M used four onsite wells for their study. They included two 2-inch overburden wells: 1-82 and 2-82; and two bedrock wells: RW-2 and RW-4. They note that the upper 80 feet of RW-4 was recased and sealed during the late 1960's (no reference provided) to prevent overburden leakage through a possibly deteriorated surface casing. Several conclusions from the groundwater investigation were:

- Groundwater at the Hawthorne Plant contained the organic chemicals PCE, 1,1,1 TCA, TCE, trichlorofluoromethane, nitrobenzene, and toluene; the greatest concentrations of these chemicals occurred in the bedrock formation. G&M concluded that since Inmont had no records of using the organic chemicals found in the groundwater at the site, and the compounds were characteristic of the dye stuff industry, activities associated with the Weidman Silk Dyeing Company were most likely responsible for the introduction of the compounds into the groundwater system.
- G&M noted that nitrobenzene and toluene were only detected in the bedrock wells. They suggested that these compounds were introduced into the bedrock aquifer near the underground tank farm (Tank Farm No.1) through downward migration caused by depressed heads of local and regional aquifer pumping. This vertical migration was facilitated by the hydraulic connection between groundwater in the overburden and bedrock.

The hydraulic connection was based on observed fluctuations of the water levels in the water table aquifer during pumping (and sampling) of the bedrock wells. Drawdowns of 2.5 and 7 feet in wells 1-82 and 2-82, respectively, were recorded in response to pumping both RW-2 and RW-4 at 50 gallons per minute (gpm) prior to sampling. G&M reported that the overburden aquifer in the area of RW-2 and RW-4 probably has moderate to high permeability values of 1,000 to 10,000 gpd/ft<sup>2</sup>. This was consistent with lithologic information that indicated the presence of large quantities of sand and gravel beneath the site.

G&M also noted that some of the chemicals found in the site aquifer systems were probably ubiquitous throughout much of the regional aquifer, a condition typical of industrialized areas.

### 1983

- May 23 T. Harrington informed A. Brokaw that the municipal water facility received a rating of "conditionally unacceptable" because of the following deficiencies: absence of screened casing vents and, no observation window or automatic gas alarm for the chlorination facilities.
- July 25 A. Brokaw, Commissioner of the Borough of Hawthorne, Department of Public Works, contacted R. Oberthaler, Programs Manager for the Bureau of Potable Water regarding his receipt of a letter, dated May 23, 1983, pertaining to an upgrade of the Hawthorne water system. The proposed cost of the upgrade was \$1,000,000 and Lee T. Purcell Associates of Patterson, New Jersey was authorized to perform the work.
- August 4 NJDEP notified the HWD that it was delinquent in submitting June 1983 bacteriological sampling results.
- August 30 NJDEP DWR approved G&M recommendations concerning additional investigative work to be performed at the Inmont facility. NJDEP also required that the investigation include:
- Attempt to locate bedrock wells on site;
  - Install wells according to NJDEP specifications;
  - Collect split spoon samples;
  - Sample and analyze groundwater for priority pollutants;
  - Obtain groundwater elevations; and
  - Report investigative findings.

### 1984

- January 6 W. Whipple, Administrator of the Water Supply and Watershed Management Administration, notified the Hawthorne Water Department that its timely response to the Infrastructure Survey Letter would result in its loan approval of \$1 million dollars for a groundwater treatment system.

- February 3 NJDEP-DWR required Inmont to:
- Install 5 more overburden wells and 3 bedrock wells;
  - Sample for base neutral compounds;
  - Report other chemicals found at elevated concentrations other than base neutrals; and
  - Submit a report by June 15, 1984.
- February 9 J. Mikulka, Chief of the NJDEP Northern Region Enforcement Element, notified Hawthorne Water Department that the water authority was delinquent in submitting bacteriological sample results which were due January 10, 1984.
- March 28 A. Knight, Senior Counsel of the Calgon Corporation, notified H. Kachroo, NJDEP DWR that H. Jecker, Calgon Plant Manager, W. Ebaugh of Bucek & Ebaugh, consulting hydrogeologist, and the Calgon legal counsel were to meet with NJDEP on April 19.
- April 11 R. DeMito Supervisor for the Compliance Monitoring Unit, Northern Region Enforcement Element, informed A. Brokaw, Commissioner of Hawthorne Borough, Department of Public Works that it received a "conditionally unacceptable" rating. Deficiencies noted during the inspection were: absence of screened casing vents on the Goffel Road municipal wells, and no ladder cage on the Fairview storage tank (water tower).
- May 10 R. Tatham informed F. Kuzniacki, NJDEP DWR Compliance Investigator, that screened casing vents were being installed on the Goffel Road wells, and further noted that a safety harness was employed for climbing the ladder on the Fairfield storage tank.
- May 11 V. Monaco, Principal Environmental Engineer for the Bureau of Potable Water notified HWD that total trihalomethane (TTHM) analyses were not submitted to NJDEP for the first quarter of 1984.
- June 6 P. Pillari, Controller for Hawthorne Prints, Inc., requested instructions from NJDEP Solid Waste Administration regarding the disposition of numerous manifest numbers. Manifests were attached.
- July 20 J. Fischette, Senior Attorney for the Calgon Corporation, submitted analytical results of fifteen monitor wells to H. Kachroo, NJDEP-DWR. Monitor well nos. 1 through 14 were sampled on May 23, 1984 and monitor well no. 15 was sampled on July 5, 1984. Princeton Testing Laboratory of New Jersey analysed



samples for mercury and volatile organic compounds. Benzene, chlorobenzene, chloroethane, 1,1-dichloroethane, 1,1-dichloroethylene, 1,2-trans-dichloroethylene, 1,1,1-trichloroethane, trichloroethylene, and vinyl chloride were all detected at levels of several parts per billion. Mercury was detected at monitor well 15 at an elevated concentration of 4.2 ppm. Other locations exhibited low mercury concentrations.

August G&M prepared a report titled, "Summary of Groundwater Conditions at Inmont Corporation's Plant, Hawthorne, New Jersey".

Some conclusions reported in the G&M investigation included:

- The base neutral compounds nitrobenzene and aniline appeared to be the primary contaminants of concern at the plant, and were present in both the overburden and bedrock aquifers.
- Aniline was more widely spread than nitrobenzene, which was attributed to its earlier use at the site.
- Several other base neutral compounds detected in groundwater at the site were: 1,2,4-trichlorobenzene; dimethyl phthalate; and 1,2- 1,3- and 1,4-dichlorobenzene.
- Groundwater flow in the bedrock was controlled mainly by the pumping at the municipal well field and by the Passaic River; the river served as a groundwater discharge boundary. G&M states that as a result of these two influences, groundwater flow in the northern two-thirds of the site was generally toward the north; and flow in the southern one-third was generally toward the Passaic River (southward).
- Under static (no onsite pumping) conditions, G&M found no evidence that indicated nitrobenzene was migrating off the Inmont facility, to either the east (Calgon property) or west.

August 15 H. Kachroo, NJDEP DWR, provided R. Barg, Chief of the Bureau of Potable Water with results of the July 20, 1984 sampling event and recommended that monitoring of water quality continue semi-annually. Groundwater samples collected from the South Wagaraw well field indicated total VOC concentrations was 69.5 ppb for well no. 10, and 47.5 ppb for well no. 12. No mercury was detected in wells sampled.

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period 1980 - 1985

- August 20 A series of reports prepared by Industrial Corrosion Management Inc., listed volatile organic compounds present in the Borough of Hawthorne wells. TCA (1,1,1-trichloroethane), TCE (trichloroethylene), and PCE (tetrachloroethylene) were detected at concentrations of greater than 2 ppb.
- August 30 H. Kachroo, NJDEP-DWR, informed J. Preczewski, NJDEP Bureau of Water Supply that hydrogeological studies conducted by Dames and Moore, and Bucek & Ebaugh had concluded that the groundwater beneath Calgon's site was contaminated with VOCs and mercury. The Inmont site contracted Geraghty & Miller, Inc. (G&M) to undertake a groundwater contamination investigation at the site. G&M's preliminary evaluation of groundwater conditions at the Inmont facility concluded that the groundwater was contaminated with organic chemicals, with the greatest concentrations apparently occurring in the bedrock formation.
- September 1 A survey form for pipe identification prepared for New Jersey Bureau of Potable Water provided descriptions of Hawthorne Water Departments' pipes construction material. Distribution lines were composed of 75% iron and steel and 25% of asbestos-cement; cement lined pipes account for 10%; storage tanks were composed of reinforced concrete, iron and steel; service lines and home plumbing were galvanized and made of copper; caulking was composed of 50% lead.
- September 14 G&M prepared the report "Summary of Groundwater Conditions at the Inmont Corporation's Plant". The report indicated that high concentrations of nitrobenzene and aniline were detected in the groundwater and suggested pumping monitor well RW-2 continuously to maintain hydraulic control of the onsite groundwater.
- October 1 NJDEP DWR briefly reviewed G&M's groundwater report concerning the Inmont facility and deferred additional sampling and analysis until a comprehensive review could be conducted.
- December 13 S. Spayd, Bureau of Groundwater Pollution Analysis, New Jersey Geological Survey (NJGS), provided a review of the August 1984 Hydrogeologic Report (Geraghty and Miller, August 1984) to H. Kachroo, Assistant Chief, Northern Enforcement Region. The following items were outlined with respect to the areas of concern:
- The major base neutral contaminants were aniline, nitrobenzene, 1,2,4 trichlorobenzene, dimethyl phthalate, and the dichlorobenzenes. Major volatile organics present were toluene, benzene, and 1,1,1 trichloroethane;

- The groundwater system (the Brunswick bedrock aquifer) is directly connected to the Inmont site. Pumping at the northern perimeter of the site, very near Hawthorne's North Wagaraw well field (200-300 feet away) induces a portion of the groundwater beneath the Inmont site to flow toward the well field;
- The North Wagaraw well field was sampled once and analyzed for base neutrals by Inmont's consultant. Aniline was not analyzed. Aniline had been found at high concentrations in groundwater within the Brunswick aquifer at this site (up to 27,000 ppb). Concentrations of aniline in monitoring wells nearest the North Wagaraw well field ranged between 45 to 270 ppb. Aniline may have been used by the Weidman Silk Dyeing Company around 1900.
- The highest levels of contaminants were found in the southern area of the Inmont site near the Passaic River. Levels of about 100,000 ppb total organics (mostly nitrobenzene and aniline) were likely discharged to the Passaic River.
- High specific gravities of contaminants aid in the downward vertical migration through the many nearly vertical fractures found in the Brunswick aquifer. Chemical odors were observed when penetrating deep fracture zones in the aquifer during drilling.
- "A separate chemical phase" (floating product) was found at monitor well BR 3-84. The zone was sealed off at this well; a second well (BR 4-84) was installed adjacent to BR 3-84 as an "abatement well". It was not known if cleanup had been initiated at this location.

Recommendations of the NJGS included:

- Sampling for base neutral compounds (EPA Method 625), VOCs, and aniline. The NJGS suggested adding two overburden wells at the northern area of site, and two sets of cluster wells (consisting of one overburden well and one bedrock well) in the western area of the site. All pumping tests were to be coordinated with Calgon. Cleanup of the groundwater would potentially continue indefinitely unless the source of the contamination was removed, contained, and/or treated.

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period 1980 - 1985

1985

- January 16 Inmont and NJDEP-DWR met to develop a schedule of activities to be included in the recommended groundwater remediation program.
- February 5 Water samples were collected for analysis from the North Wagaraw Public Supply well no. 3.
- February 5 Canonie Engineers removed 13 tanks from the Inmont facility, Tank Farm No.1.
- March 7 NJPDES Permit No. NJ0002453 (Discharge to Surface Water) was issued to the Inmont Corporation, Hawthorne Plant, N.J. The Permit allowed/regulated discharge to the Passaic River which was classified as FW-2, non-trout. Effective date: 5-1-85. Expiration date: 4-30-90. (Lan Associates, GIS/SES, 1985).
- March 8 The NJDEP Hazardous Waste Facility Annual Report, Part I covered the calendar year 1-1-84 through 12-31-85. Prepared by P. Mock, Inmont Corporation, Hawthorne, N.J. EPA Facility No.: NJD 002165371. A total of 18,592 gallons of waste solvent (U 239) was shipped to a solvent recovery service.
- June 17 V. Monaco, NJDEP-DWR, Bureau of Potable Water, informed F. Purcell, Lee T. Purcell Associates, that NJDEP-DWR had received an application dated June 10, 1985, and included plans and specifications. The application and information was provided to address issues concerning additions and alterations to the Hawthorne Municipal water distribution system.
- Jul - Aug Ground Water journal article "*Movement of Volatile Organics Through a Fractured Rock Aquifer*", S. Spayd, Principal Geologist, NJGS Ground Water Pollution Analysis Program. The article reviewed anisotropic behavior of groundwater flow within the Brunswick fractured rock aquifer, including identification of potential contaminant sources in Fair Lawn, N.J.
- August UTC signs ECRA Administrative Consent Order (ACO). (Note: Hart, 1990, states that the ACO was signed in July 1985).
- August 16 T. Russo, Environmental Coordinator at Inmont Corporation, provided R. Plumb, Assistant Chief, Enforcement Element, NJDEP-DWR with a recovery report of water and solvents for the period of July 13 through August 9, 1985. No solvents were reported in any of the trenches (1, 2 and 3 were reported). A summary of the water levels and free product accumulations, measured in the overburden and bedrock monitoring wells made by Geraghty & Miller on July 12, 1985, were

included (32 wells and 3 trenches were measured). Five wells (nos. 3B, 4B, 5B, 8B, and RW2) and one trench (no. 2) showed free product.

August 21 BASF purchased the Inmont facility from UTC.

September 20 J. Rogalski, Assistant Director, Field Operations, NJDEP-DWM Compliance and Enforcement, informed E. Mueller, Hawthorne Prints, Inc. that a penalty settlement offer of \$3,250.00 must be paid by October 4, 1985 for various violations of the Solid Waste Management Act during the 1984 Route 80 truck accident/chemical spill.

September 25 R. Barg, Chief, Bureau of Potable Water, provided R. Snyder, Hawthorne Water Department, with a summary of VOC analyses results for several wells in Hawthorne sampled on June 11, 1985. Results showed tetrachloroethylene and trichloroethane concentrations of 11 ppb at the Cedar Avenue well; and a trichloroethylene concentration of 15 ppb at the Wagaraw Road well field.

December 15 D. Muscalo, Senior Geologist, Bureau of Ground-Water Pollution Analysis, New Jersey Geological Survey provided R. Schneider, Hawthorne Water Department with a general geologic map of Hawthorne's bedrock based on available data. Most of Hawthorne is underlain by the Brunswick Formation (Passaic Member). At the extreme western Borough boundary, basalt lava flows are exposed. Bedrock throughout most of Hawthorne is buried by sand and gravel derived from glaciers and the Passaic River. However, massive exposures of bedrock outcrop occur west of Goffle Road in the Hawthorne Heights area. A cross-section of the area through the Calgon site was provided. The strike direction of the bedrock strata is nearly north-south, and the strata dips to the west at 10 to 15 degrees. The strike direction was considered the predominant factor controlling groundwater flow direction.

December 20 H. Kachroo, NJDEP-DWR Northern Bureau of Regional Enforcement, informed J. Preczewski, Bureau of Water Supply, Water Supply and Watershed Management Element, that sources contributing to the wide spread contamination of the municipal wells [sic] were not known.

July 1985-February 1986

A 3000-gallon RCRA tank was used by BASF-Inmont to store flammable liquid containing xylene, oil, diarylide yellow, and azo red pigments; it was located immediately adjacent to Tank Farm No. 2. The mixture was generally dark red in color. It was classified as a RCRA hazardous substance because of its ignitability.

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1980 - 1985**

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1986

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Former Inmont Facility

150 Wagaraw Road  
Hawthorne, New Jersey

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1986

- January 29 NJDEP-DWR Enforcement Element - Northern Region provided the Honorable L. Bay, Mayor of Hawthorne, with a summary of groundwater analysis results obtained from Hawthorne municipal well nos. 3, 4 and 5 collected on November 20, 1985. Nytest Environmental Inc. results indicated the presence of nitrobenzene at 82 ppb in groundwater from well no. 4. The correspondence also noted that nitrobenzene had also been found beneath the Inmont Corporation site.
- February 14 A. Schneid, Technical Manager, BASF Inmont, forwarded a signed DMR for the period July 1 to December 31, 1985. Five readings were above pH 9. The elevated readings were attributed to rain leaching soils where two sodium hydroxide tanks were previously located. The two tanks were removed during the early part of 1986.
- Color exceeded permitted levels on two occasions. BASF noted that their intake was considerably poorer than their discharge. Improvement of discharge was attributed to settling in BASF holding ponds.
- March 6 A.J. Gaggis, BASF forwarded R.G. Thomas an internal memorandum and a newspaper article concerning Hawthorne's water problems and noted that the article was more accurate [than previous articles]. The article, which appeared in the Hawthorne Press (March 6, 1986), stated that officials noted a lack of pattern in the presence of various chemicals. The interoffice memorandum also noted that the State of New Jersey did not report the presence of nitrobenzene.
- March 13 S. Nieswand, Chief, Bureau of Safe Drinking Water, provided R. Snyder, Hawthorne Water Department, with a summary of HWD A-280 monthly sample (October, November, December, 1985) analyses (Table 3). Snyder was warned that the levels of contaminants of the Wagaraw Road, First Avenue, Rea Avenue, Bamford Avenue, Grand Avenue and Cedar Avenue Treatment Plants were NOT ACCEPTABLE in drinking water. Acceptable alternative drinking water was to be provided WITHIN ONE YEAR of the date of the letter. Snyder was advised to continue quarterly sampling.
- March 18 A. Schneid, Technical Manager, BASF, informed the U.S. EPA, North Carolina, that BASF-Inmont Corporation (Chemicals Division), Hawthorne, New Jersey, was operating under EPA Permit NJD 002165371. BASF also stated that manufacturing procedures and product lines remained unchanged.

- March 18 E. Emery, Organic Laboratory Manager, Nytest Environmental, provided R. Tatham, Borough of Hawthorne, with test results for Wagaraw Road well nos. 3, 4, and 5. Detection limits for all base neutrals was 1 ppb. Only bis-2-ethylhexyl phthalate was detected (290 ppb).
- March 21 New Jersey Hazardous Waste Facility Annual Report Form VI; Certification Statement & List of Attachments. Signed by A. Schneid, BASF Corporation.

Table 3: Water treatment plants not acceptable for providing public drinking water.

Water Treatment Plant	Interim Action Level*	Major Contaminants	Maximum Concentration (ppb)
Wagaraw Road	III	Trichloroethylene Tetrachloroethylene	62 24
First Avenue	III	Tetrachloroethylene	15
Rea Avenue	III	Tetrachloroethylene	10
Bamford Avenue	III	Trichloroethylene Tetrachloroethylene Carbon Tetrachloride	40 15 4
Grand Avenue	III	Trichloroethylene Tetrachloroethylene Carbon Tetrachloride	160 62 24
Cedar Avenue	III	Trichloroethylene Tetrachloroethylene	40 24

\*Level III - Confirm sampling results; monthly monitoring; develop within one year alternative water supplies and/or appropriate treatment techniques for public community water systems; recommend appropriate remedial actions to public noncommunity water systems; and quarterly progress reports from both public community and public noncommunity water systems.

The form reported annual totals for Treatment, Storage, or Disposal Processes, Annual Waste Stream totals, and Generator totals. This information is summarized in Tables 4, 5, and 6. BASF noted that there were no rejected manifests.

Table 4: Treatment, Storage, or Disposal Process Totals:

Handling Method	Number	Description	Amount
S05	X387	PCB Empty Transformers	4500 lbs
S01	0008	Solids from dust Collector	1103 lbs
S02	U239	Waste Solvent Pigment Sludge	11564 g
S01	F004	Nitrobenzene Contaminated Water	36550 g
S01	U169	Nitrobenzene Waste	3168 g
S01	X900	Pigmented Varnish Liquid	4200 g
S01	X387	PCB Askarel Liquid	6017 lbs
S03	X387	PCB-contaminated Scraps	400 lbs

Table 5: Annual Waste Stream Totals:

Handling Method	Number	Description	Amount
	U239	Solvent Pigment Sludge	13214 g
	F004	Nitrobenzene contaminated Water	36550 g
	U169	Nitrobenzene Waste	3168 g
	X900	Pigmented Varnish Liquid	4200 g
		PCB Askarel Liquid Transformer Scrap	10717 lbs
	D008	Solids from Dust Collector	1103 lbs

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Table 6: Generator Report Totals:

Handling Method	Number	Description	Amount
S03	X387	PCB-contaminated Scraps	400 lbs
S05	X387	PCB Empty Transformers	4500 lbs
S01	D008	Solids from Dust Collector	1103 lbs
S01, S02	U239	Waste Solvent Pigment Sludge	13214 g
S01	F004	Nitrobenzene Contaminated Water	36550 g
S01	U169	Nitrobenzene Waste	3168 g
S01	X900	Pigmented Varnish Liquid	4200 g
S01	X387	PCB Askarel Liquid	6017 lbs

March 27 H. Kachroo, NJDEP, Enforcement Element, Northern Region notified A. Schneid, Technical Manager, BASF Inmont Corporation that the facility received a rating of "UNACCEPTABLE" based on observations of a department representative from the Division of Water Resources, made during a Multi-media Facility Inspection. The unacceptable rating was due to violations of the NJPDES Permit (NJ0002453):

- pH limits exceeded;
- Copper in effluent was not monitored (or absence of a notation stating that it is not required);
- Temperature not monitored;
- DMRs not submitted monthly;
- Non-notification of change of contract laboratory;
- Illegal discharge of contaminated water from Building 27 (pumped and discharged to the storm drain, on January 22, 1986); and
- Waste analysis plan was not updated to include a xylene waste stream or specify a sample collection procedure for this waste stream.

April 4 R. Synder, Chief Operator, Hawthorne Water Department, requested T. Lee, Bureau of Safe Drinking Water, to return the Bamford Avenue, Cedar Avenue,

and Grand Avenue wells to service because analytical tests showed reduced concentrations of VOCs for February and March, 1986.

- April 7 A. Schneid, Technical Manager, BASF Chemical Division, notified NJDEP (written communication) of a sulfuric acid spill at the Inmont Hawthorne, New Jersey facility. The spill occurred on April 4, 1986 at approximately 10:00 a.m. BASF estimated that 20 gallons of sulfuric acid overflowed through a discharge pipe into an adjacent storm sewer. NJDEP was notified by telephone on April 4, 1986.
- April 11 H. Kachroo, Principal Environmental Engineer, Northern Bureau, Regional Enforcement (NBRE), provided analytical results (March 18, 1986) of municipal wells to Mayor Bay of Hawthorne. Analytical results showed that Wagaraw Road municipal well no. 3 contained 290 ppb of bis-2-ethylhexyl phthalate.
- April The 3000-gallon RCRA tank (xylene tank) was cleaned by BASF. Cleaning was accomplished by pumping the tank dry and washing the interior. The procedure consisted of:
- Partially filling the tank with caustic detergent and water, then heating the mixture with a steam line
  - Washing the inside of the tank with the steam; and
  - Properly removing and disposing of the used cleaning mixture.
- May 12 F. Purcell, Lee T. Purcell Associates, outlined engineering tasks associated with the removal of volatile organic compounds from Hawthorne municipal groundwater supplies. These tasks included three phases: study phase, design phase, and construction phase. A pilot test including on-site air stripping and granular activated carbon filtration was suggested.
- May 20 F. Purcell, Lee T. Purcell Associates, informed S. Nieswand, Chief, Bureau of Safe Drinking Water, DWR NJDEP, that the Borough of Hawthorne retained Purcell Associates to complete the tasks outlined in the Lee T. Purcell Associates letter dated May 12, 1986.
- May 21 P.R. Arvidson, Vice President of Environmental Affairs, BASF, notified M. Schniedermeyer of UTC, that BASF informed NJDEP-ECRA that BASF Chemicals Division-Environmental Affairs would be responsible for ECRA matters at the Hawthorne Facility.

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
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- May 23 P.R. Arvidson, BASF, provided A. McMahon, NJDEP Bureau of Industrial Site Evaluation, Division of Waste Management, with a copy of the BASF Corporation press release (dated May 14, 1986) announcing the anticipated closing of the Inmont Hawthorne Plant.
- May 28 P.R. Arvidson, BASF, notified M. Barbara, Hart Associates, of his displeasure with the way Hart handled a situation which arose during BASF's removal of USTs at the Hawthorne facility. The Hart representative did not indicate that he felt a serious problem existed and did not notify BASF personnel about the situation. (A memorandum from Hart personnel indicated that some minor spills of cleaning water had occurred).
- May 29 C. Campanile of The News requested that J. Mikulka, Chief, Northern Region Enforcement Element provide all public information on Hawthorne's wells.
- June 2 S. Nieswand, Chief, Bureau of Safe Drinking Water informed R. Snyder, Hawthorne Water Department, that analytical results of samples collected by the Bureau of Safe Drinking Water confirmed that the Borough of Hawthorne system was at Level III. Levels of contaminants as shown WERE NOT ACCEPTABLE in drinking water. The Bureau of Safe Drinking Water requested a formal acknowledgement discussing the intentions of the Borough concerning its water supply system.
- June 11 R. Katz, Assistant Chief, NJDEP- BISE, notified P. Arvidson, BASF, that he received the May 23, 1986 correspondence indicating the anticipated closure of the Hawthorne Facility. Mr. Katz stated that closure of the BASF Inmont facility would involve a separate ECRA-regulated transaction. Closure would require a General Information Submission (GIS) and later a Site Evaluation Submission (SES), along with a filing fee. He also noted that there was a distinct possibility of a future change-of-use for the Inmont facility; and it might be necessary to incorporate a more extensive decontamination/decommissioning procedure.
- June 12 A. Schneid, BASF, provided NJDEP with DMR reports for periods 1/86 through 4/86. Noted that pH and color exceeded NJPDES permit levels.
- June 16 P.R. Arvidson, BASF, responded to M. Barbara, Hart Associates, clarifying a mutually-agreed upon chain of communication regarding ECRA matters. Mr. Arvidson provided names and telephone numbers of appropriate personnel.
- July 3 A. Schneid, BASF, provided Cooperman, NJDEP, with a DMR for May 1986. No variances were noted.

July 11 NJDEP notified A. Brokaw, Commissioner of Hawthorne Water Department, Hawthorne Borough, that the Borough facility received a rating of "UNACCEPTABLE" because the water supply was still contaminated. Twenty-two wells were examined. The HWC was under Action III level.

August 11 BASF RCRA Closure Plan. (See August 22 entry).

August 22 D. Webster, BASF, provided R. Dane, UTC, with copy of the Closure Plan for the BASF Inmont Hawthorne facility. The Closure Plan was dated August 1, 1986. The summary sheet described two hazardous waste storage units:

- Drummed material consisting of non-reactive dust collector solids contaminated with lead chromate pigment. These materials were classified as hazardous because of its IP [sic] (probably EP) toxicity for lead and chrome; and
- A UST containing flammable liquid composed of xylene, soil, and diarylide yellow and azo red pigment. Classified as hazardous based on ignitability. The substance was generally dark in color with a specific gravity of 0.86 [sic] (gm/cm<sup>3</sup> ?) and a flash point of 29°F.

The Closure Plan included a Schedule, General Requirements, Closure Performance Requirements for the Drum Storage Area, Closure Performance Requirements for the UST Area, a Cost Estimate, a Sampling and Analysis Plan (SAP), and laboratory QA/QC (Accutest Laboratories).

September 9 R. Plumb, NJDEP-Enforcement Element, Northern Region, provided H. Jecker, Calgon with a site history of the contamination of the North and South Hawthorne Borough municipal well fields (North and South Wagaraw Road). Nine of the 22 municipal wells are located near the Calgon and Inmont facilities. The North and South Wagaraw well fields were sampled on November 5 and 10, 1981 by NJDEP. Trichloroethane was detected in well nos. 3 (60 ppb), 4 (80 ppb), 5 (45 ppb), 6 (60 ppb), 7 (40 ppb) and the combined well field flow (15 ppb) of the North Wagaraw well field.

In 1982, there was a substantial decline in the concentration of VOCs in both municipal well fields. Wells near the Calgon Metasol plant declined from 36.53 ppb to 2.19 ppb. Wells near the Inmont facility declined from 172.3 ppb to 53.4 ppb. In August 1983, the presence of VOCs at well no. 10 (69.5 ppb) and well no. 12 (47.5 ppb) in the South Wagaraw well field adjacent to the Calgon facility were reported. Major contaminants in the groundwater at Calgon's site included:

- VOCs - benzene, toluene, tetrachloroethylene, methylene chloride, 1,1-dichloroethane, 1,1-dichloroethylene, vinyl chloride, chlorobenzene, trichloroethylene, & 1,2,4-trichlorobenzene;
- Base Neutrals - Bis-2-ethylhexyl phthalate; and
- Metals - mercury, arsenic, and lead.

On February 5, 1985 representatives of NJDEP sampled the North and South municipal well fields and again analytical results indicated the presence of VOCs in both well fields. Moreover, the South Wagaraw well field (wells no. 10, 11, and 12) was contaminated by some of the same VOCs collected from the overburden and bedrock aquifers at the Calgon site. BNs and VOCs detected at the South Wagaraw well field included: bis-2-ethylhexyl phthalate, chlorobenzene, tetrachloroethene, 1,1,1-trichloroethane, and trichloroethylene (trichloroethene).

NJDEP determined that Calgon had discharged NJDEP-designated "hazardous substances" (Spill Compensation and Control Act; N.J.A.C. 7:1E, Appendix A) into the groundwater: bis-2-ethylhexyl phthalate, 1,2,4, trichlorobenzene; tetrachloroethylene; trichloroethylene; toluene; chlorobenzene; benzene; vinyl chloride; methylene chloride; 1,1-dichloroethylene; mercury; lead; and arsenic. The Calgon discharges also violated the Water Pollution Control Act; N.J.S.A. 58:10A-1 et seq., specifically, N.J.S.A. 58:10A-6; and the regulations promulgated pursuant thereto, N.J.A.C. 7:14A-1 et seq., specifically, N.J.A.C. 7:14A-1.2(c).

September 9 R. Plumb, NJDEP, notified A. Gaggis, BASF, of significant groundwater contamination at the Inmont Hawthorne Facility, and that detailed sampling and analysis of wells near the BASF facility showed that Inmont had discharged bis-2-ethylhexyl phthalate, di-n-butyl phthalate, 1,2,4 trichlorobenzene, nitrobenzene, 1,2 dichlorobenzene, tetrachloroethylene, trichloroethylene, 1,1,1 trichloroethane, trichlorofluoromethane, toluene, and chlorobenzene into the groundwaters of the State. BASF-Inmont was directed to:

- submit a proposed Work Plan for an RI/FS for the Borough of Hawthorne's well field;
- arrange for and pay the Borough for the cost of design, installation, operation and maintenance of a treatment system for its North Wagaraw well field until NJDEP determined treatment was no longer required;



- sample the North Wagaraw well field; and, submit a schedule for implementation of the first three items.

- October 2 R. Kissam, Vice President and General Counsel, BASF, notified R. Plumb, NJDEP, that BASF acknowledged receipt of the Directive issued by NJDEP (9/9/86). However, BASF rejected NJDEP's contentions, declined responsibility for sampling Borough well fields, and did not acknowledge NJDEP's authority to issue a directive under the Water Pollution Control Act.
- October 7 P. Arvidson, BASF, notified J. Schneidermeyer, UTC, that issues covered by the NJDEP Directive concerning the Borough of Hawthorne well fields were clearly within the Scope of UTC's ACO and not a responsibility of BASF.
- October 10 H. Jecker, Plant Manager, Calgon Corporation, forwarded a standard Application Form and an application to discharge wastewater to a sanitary sewer to K. Goldstein, Chief, Bureau of Industrial Waste Management, NJDEP-DWR.
- November 4 W. Upham, Supervising Examiner, Special Claims at Liberty Mutual, notified J. Koutsares, Manager, Risk Claims Administration, Risk & Insurance Management, that in accordance with the UTC/Inmont Pollution Liability Policy, Liberty Mutual would not provide coverage at this time due to Amendatory Endorsement 66 which stated:

*It is agreed that personal injury and property damage arising out of the discharge, dispersal, release or escape of smoke, vapors, soot, fumes, acids, alkalis, toxic chemicals, liquids or gases, waste materials or other irritants, contaminants or pollutants into or upon the land, water or the atmosphere are excluded.*

In addition, the last day of the last exposure which caused injury or destruction had not occurred prior to termination of the policy on October 1, 1985.

- November 6 Department of Public Works, Borough of Hawthorne, provided a progress report to H. Kachroo, NJDEP-DWR, concerning VOC treatment facilities. The engineering contract with Purcell Associates was executed. Route and site surveys were completed for the Phase I design to tie-in Cedar Avenue and Maitland Avenue wells to the Wagaraw Road well field. Pilot tests using a 10-inch diameter pilot stripper were completed in the field at South Wagaraw Road well no. 12, Wagaraw Road well no. 5, the Grand Avenue well and the Goffle Road well no. 1. All documents for a contaminated well field low interest loan were found acceptable by Mr. Oberthaler, Chief, Loans Program of NJDEP.

- November 6 Meeting between NJDEP, BASF, and Borough of Hawthorne. Attendance sheet. No information.
- November 10 P. Arvidson, BASF, corresponded with A. Messina, UTC, concerning discussions at the November 6 meeting. Mr. Arvidson prepared a list of items required by BASF/UTC to determine responsibilities of BASF/UTC on the Borough of Hawthorne well field issue. Mr. Arvidson requested that Mr. Messina review the list and provide comments.
- November 17 T. Feder conducted a BASF-Inmont NJDEP file review. Memorandum outlined files examined.
- November 25 J. Fallon, Assistant Chief, Bureau of Industrial Site Evaluation, Division of Hazardous Waste Management, NJDEP, notified M. Schneidmeyer, UTC, that the Inmont Corporation-Hawthorne Facility Sampling plan was disapproved. Eighteen comments were provided.
- December 4 A letter from Kathy Szczepanik, Community Relations Manager for Monmouth Consolidated Water Company explained to customers that an increase in bacteria counts of a harmless, non-pathogenic organism called Enterobacter cloacae was present in the utility's distribution system. There were no known health hazards associated with this bacteria. The exact cause of the problem was unknown, but it was believed to be caused by one or more of the following: heavy rainfall; temperature change; or a substantial water main rupture.
- December 5 E. Skula, BASF, provided R. Dane, UTC, with a copy of documents obtained from NJDEP (Northern Region Office, Parsippany, N.J.). Summary of documents: Directives 8-30-83 through 10-1-84 to Inmont, Correspondence between NJDEP and Borough of Hawthorne.
- December 8 F. Marrazzo, Bureau of Permits Administration, Water Quality Management notified H. Jecker, Plant Manager, Calgon Corporation that the application for a New Jersey Pollutant Discharge Elimination System (NJPDES) permit was administratively incomplete.
- December 9 News Release from Monmouth Consolidated Water Co. regarding increase in bacteria count in the utility's distribution system.
- December 9 P. Burdan of Monmouth Consolidated Water Company reported to various Governmental agencies within the Monmouth Consolidated Water Company

service area that the maximum contaminant level (MCL) for coliform bacteria was exceeded for the month of November.

December 19 ECRA-GIS, BASF Corporation, Hawthorne Facility. Permits:

- NJ0002453 for discharge of non-Contact cooling water and storm water to the Passaic River. Issued April 30, 1985, expired April 30, 1990.

Violations:

- NJDEP order to cease violation, 4/29/74; five mixing tanks and a scrubber were constructed without construction permit. Operating permit obtained.
- Notice of Prosecution, 9/26/74; Kettle K-15 disconnected from a packed scrubber without a permit to alter control equipment. Fined \$200.00. Paid fine 12/4/74.

Hazardous Waste Summary Form:

- Reporting year 1985 - 34,992 gallons, 10,917 pounds of hazardous waste generated.
- Waste solvent - Xylol U239, 9976 gallons
- Nitrobenzene F004, 4250 gallons
- Nitrobenzene F004, 24,600 gallons
- Nitrobenzene F004, 3168 gallons
- Waste solvent-Xylol U239, 3238 gallons
- PCB-ORM-E X387, 10,917 pounds
- Liquid Varnish-ORM-E X900, 4200 gallons

December 26 W. Whipple, Assistant Director, NJDEP - Water Supply and Watershed Management Element notified D. Hoffman, Deputy Director, that Monmouth Consolidated Water Company exceeded Safe Drinking Water Act limits for coliform bacteria during November 1986. This was attributed to the non-pathogenic strain, enterobacter cloacae.

Date ? Tank Farm No.2 was excavated by BASF. Soils were separated based on visual observations; visually contaminated soils were stored near Building 5; soils which showed no visual contamination were used to backfill the excavation.

**Site History  
Former Inmont Facility  
150 Wagaraw Rd  
Hawthorne, New Jersey**

***Prepared for:***

**United Technologies Corporation  
United Technologies Building, MS 507  
Hartford, Connecticut**

**May 29, 1992**

**Baker**

**Baker Environmental, Inc.**  
Princeton Commerce Center  
Building C, 29 Emmons Drive  
Princeton, New Jersey 08540

(609) 987-6900  
FAX (609) 243-0558

May 29, 1992

Mr. Troy J. Charlton  
United Technologies Corporation  
United Technologies Building, MS 507  
Hartford, Connecticut 06101

Subject: **Submission of Site-History Compilation for the Former Inmont Facility  
Located at 150 Wagaraw Road, in Hawthorne, New Jersey**

Dear Troy:

Please find attached Baker Environmental, Inc.'s (Baker's) Site-History Compilation for the subject facility. Pursuant to your request, this compilation was developed following extensive review of background information contained within the following files and/or sources of information:

- ▶ McLaren-Hart, Inc. project files;
- ▶ United Technology Corporation (UTC) project files (in-house);
- ▶ Calgon Corporation files maintained by New Jersey Department of Environmental Protection and Energy's (NJDEPE's) Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA); and New Jersey Geological Survey (NJGS) (archive);
- ▶ former Inmont Corporation files maintained by NJDEPE's BEECRA and NJGS (archive);
- ▶ BASF Corporation files maintained by NJDEPE BEECRA and NJGS (archive files);
- ▶ UTC files maintained by NJDEPE BEECRA and NJGS (archive files); and
- ▶ Borough of Hawthorne's Water Department files.

**844230209**

**Baker**

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May 29, 1992  
Mr. Troy J. Charlton

Please feel free to contact Annette Mario or me with any questions you or other members of UTC may have regarding this submission.

Respectfully,

BAKER ENVIRONMENTAL, INC.

John M. Ash (Jay), P.G.  
Task Manager  
Manager, Department of  
Geological & Environmental Sciences

844230210

844230211

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1987**

**844230212**



1987

- January 30 R. Dane, UTC, informed E. Fox, NJDEP-BISE, that UTC took exception to BISE's letter dated November 25, 1986 that stated UTC was a potentially responsible party regarding the contamination of the North Wagaraw well field. To date, UTC had not been told by NJDEP-DWR that it was a potentially responsible party. UTC responded to BISE Site Inspection Reports (4/11/86 and 4/24/86 Site Inspection dates) of the Hawthorne facility were enclosed. Some of the responses included:
- "Recent" acid bath overflow from an above ground tank was the responsibility of BASF; and
  - Spill area was a macadam surface, not soil.
- February 4 D. Bouchard, Borough Attorney to P. Arvidson, Vice President of BASF Corporation. Letter requested an exchange of documents.
- February 20 Laboratory Resources, Inc. Report of VOCs for 8 different dates between 7/18/86 and 2/10/87.
- February 24 D. Schneider, BASF, responded to D. Borchard, Evans, Hand, Allbough & Amoreseno, Counsel for Borough of Hawthorne, regarding the February 6, 1987 letter which requested that BASF contribute to the funding of a groundwater treatment system for the Borough of Hawthorne, Wagaraw Road well field. BASF found no connection between the pollutants of concern, as identified by NJDEP in its Order of March 13, 1986, and past operations at the site.
- March 5 D. Schneider, Attorney, BASF, informed D. Borchard, Evans, Hand, Allbough & Amoreseno, Counsel for Borough of Hawthorne, that BASF found no causal connection between the pollutants of concern, as identified by NJDEP in its Order of March 13, 1986 to the Borough, and past operations at the BASF Inmont facility. BASF declined to contribute to the construction of the proposed groundwater treatment system.
- March 13 J. Kupilik, Counsel for the family of Marlene Hartung, notified the Borough of Hawthorne that a lawsuit had been brought against it by the Estate of Marlene Hartung. The Estate cited water contamination of the Borough wells as reason for Marlene Hartung's illness (leukemia).

- March 25 D. Schneider, BASF, notified R. Plumb, NJDEP, that BASF's response to the September 9, 1986 and March 11, 1987 directives was unchanged from BASF's position outlined and forwarded to NJDEP on October 2, 1986 concerning the September 9, 1986 directive.
- March 31 M. Schneidermeyer, Director of Environmental Affairs, UTC informed R. Plumb, NJDEP-DWR, that UTC denied involvement and any legal basis for being responsible for discharges of hazardous substances from the Hawthorne facility owned and operated by Inmont Corporation in reference to the Directive of March 11, 1987. UTC offered to explore opportunities for assisting with the contamination problem. In addition, UTC noted that BASF concluded that no connection existed between the Hawthorne site and the alleged municipal well field contamination problem. BASF's conclusion was based upon its inability to reproduce laboratory results reported by the Borough on November 20, 1985, February 14, 1986, and November 20, 1986. UTC agreed with BASF after reviewing the data but intended to continue to review the contamination problem.
- April 2 V. Monaco, Acting Section Chief, Bureau of Safe Drinking Water, acknowledged receipt of an application from Fenton Purcell, Purcell Associates. The application was dated March 27, 1987 and included plans and specifications for additions and alterations to existing water treatment facilities. The water treatment facilities consisted of two packed aeration towers to treat water derived from the Wagaraw Road well field, South Wagaraw well field, and Cedar and Maitland Avenue wells. Two vapor phase GAC units were to be used to treat the effluent air generated from the towers.
- April 3 B. Hamill, Chief, Bureau of Safe Drinking Water, forwarded a list of all detectable levels of A-280 chemicals found as part of the A-280 program for the Hawthorne Water Department to W. Warren, Warren, Goldberg, Berman & Lubitz, Counsel for UTC. All results were given in ppb.
- May 11 L. Tracy, Environmental Specialist, Northern Bureau of Regional Enforcement to Files. A list of suspected sources of the municipal well fields contamination based on information obtained from local residents W. Missonellie and P. Biele.
- May 11(?) Internal memorandum - NJDEP; from L. Tracy, Environmental Specialist, through R. Plumb, Assistant Chief and J. Mikulka, Chief, Northern Bureau of Regional Enforcement to NJDEP FILES. Subject: Groundwater Contamination Investigation, Borough of Hawthorne, Passaic County.

Internal memorandum outlining a discussion between D. Muscalo, NJGSE, and three residents of Hawthorne Borough: W. Missonellie and P. Biele. The group identified suspected sources of Hawthorne municipal well field contamination. Businesses identified included:

- American Electro Plating: This facility performed chrome plating and had utilized and dumped dipping tanks in the vicinity of Gerths;
- Koppel Color: The facility was no longer in operation. However, past operations included chrome plating and circuit board manufacturing. At the time of the NJDEP/Hawthorne resident discussion, the facility had been auctioned to Dexter Printing. The memorandum states that cross connections allegedly existed in the plumbing of this building;
- Zimmer Printing: The facility manufactured dye cut metal. Stains were noted on the property;
- Hermes Machine Shop: The property had multiple owners; the memorandum also noted that the facility used carbon black over 10 years ago;
- Scully's Auto Body: Floor drains from this facility were suspected to discharge directly to the ground. Spills (white) emanated from a small fenced storage area; dried paint residue was noted along a property boundary;
- Precision Screening: Poor housekeeping practices; onsite chemical storage;
- Pan Chemical: Onsite drum storage; steady discharge (NJDEP-permitted) to a storm drain/catch basin. The facility may have had a groundwater "problem";
- Calgon Corporation: A mercury dump was located near railroad tracks and drums were buried alongside a small stream at one side of property;
- Inmont: This company allegedly dumped materials or had buried tanks/drums in the area of the pilot laboratory (building no. 25). An alcohol still also operated in this area. A swale located between the main complex and a parking lot had been used to store sodium;

- Lawnmower Repair Shop: This facility discharged gasoline directly to the groundsurface, and cleaned motors directly on the groundsurface;
- Mill and Industrial Complex: The facility was the former location of dye shops. Goffle Brook flows beneath this complex. A number of companies were suspected to have tied drains into this enclosure of the brook; and
- Hawthorne Optical: A dry cleaner was previously located at this location; a second dry cleaner was located on Rea Avenue.

The memorandum concluded that there was a significant potential for contaminant releases to the environment at many of the industrial facilities and that the 12 sites should be further investigated.

- May 28 Hawthorne Press article "Citizens action group forming; meeting scheduled for June 1". Group expected to hire an environmental lawyer.
- June 1 P. Gakk for V. Monaco, Acting Section Chief, Bureau of Safe Drinking Water, received an application from F. Purcell, Purcell Associates, for a packed column and vapor phase treatment by GAC unit for the Wagaraw Road well field.
- June 3 Internal Correspondence - UTC, from R. Dane regarding analysis of cancer incidence in Hawthorne, NJ. Letter from M. Berry, Research Scientist, Environmental Disease Prevention, to G. Hartung, potential plaintiff in lawsuit against the Borough of Hawthorne included. Statistical results of leukemia cases in Hawthorne showed that from 1979 through 1984, 19 leukemia cases were diagnosed in Hawthorne. The observed number was found to be significantly different from the expected number of cases for males but not for females in this population. The observed number of male leukemia cases was approximately twice the expected number. Known environmental causes of leukemia include ionizing radiation and occupational exposures to high concentrations of chemical compounds such as benzene and related solvents. M. Berry was unable to conclude that a causal link exists between low levels of organic chemicals in the municipal drinking water and the male leukemia rate in Hawthorne, New Jersey.
- June 4 The Hawthorne Press article "Water Group Retains Attorney". Hawthorne Citizens for a Clean Environment (HCCE) raised \$1500 for a retainer fee to hire an environmental lawyer.

- June 4      The Hawthorne Press article "Borough May Accept Funds For Hydrogeological Work". Hawthorne was considering accepting the Calgon Corporation offer of \$75,000 to finance a hydrogeological study investigating the Borough's water contamination problem.
- June 10     The Hawthorne Press article "Citizens Group Gets Tough". Citizens group raised money to hire a lawyer to examine documents from 1979 to 1986, when the borough closed three wells.
- June 11     The Record stated that NJDEP was completing the investigation of the sources of contamination of the Borough's water supply. The State of New Jersey was to reimburse Hawthorne for funds expended on a new \$2.6-million dollar water treatment system.
- June 11     Hawthorne Press article titled "State NJDEP Says Contamination Dates to 1979". Hawthorne residents expressed disbelief that action had not been taken to address the contamination problem, and that pollution levels at the time the article was written were similar to 1979 levels. The residents were also unhappy that they were not informed about the safety of water consumption.
- June 12     The Record article "Water Doubts Linger On". NJDEP official stated that the water was safe to drink, but the State wanted to make it safer. An NJDEP official, Joseph Mikulka, Chief, Northern Region Enforcement Element, stated that NJDEP hoped to reach an agreement with Calgon and the Inmont Division of BASF within one month. Mikulka also stated that the agency suspected additional polluters, but declined to name them during the meeting.
- June 15     J. Perretta received an internal UTC/Inmont Memo from R. Dane regarding costs of alleged groundwater and drinking water contamination in the Borough of Hawthorne. Financial impacts are outlined in Table 7.

Table 7: Financial Impacts of Groundwater Contamination, Borough of Hawthorne, N.J.

Item	Capital Cost (\$1,000s)		Operation and Maintenance Costs (\$1,000s/Year)	
	Low	High	Low	High
ECRA Costs + Directive Costs	2,980	6,260	325	625
Settlement + Cost of ECRA with "Credit"	2,105	4,250	150	275

- June 18 The Hawthorne Press article "Lembo Says Commissioners Knew of Water Issue in 1979". Mayor Ross attempted to distance himself from his role in previous administration decisions concerning the Borough water problem.
- June 18 W. Warren of Warren, Goldberg, Berman & Lubitz, Counsel for UTC, asked W. Parker, Associate General Counsel, UTC, for the names and addresses of all shareholders of Inmont (formerly known as Interchemical Corporation) from July 2, 1946 through the date Inmont was acquired by Carrier Corporation. This information was needed for Warren to present the argument that if a subsidiary is not controlled on a day-to-day basis, the parent company should not be liable for the environmental excursions of the subsidiary.
- June 19 W. Warren of Warren, Goldberg, Berman & Lubitz, Counsel for UTC, asked J. Iannone, Hart Associates to evaluate cost estimates provided to UTC by the Borough of Hawthorne.
- June 19 W. Warren of Warren, Goldberg, Berman & Lubitz, counsel for UTC, asked J. Iannone, Senior Project Manager, Design Group, Hart Associates to calculate the potential for a VOC plume (based on point sources on UTC/BASF property feeding the plume) to be eliminated within 18 months if the North Wagaraw well field pumped the aquifer at an average of 800 gallons per minute (gpm).
- June 22 R. Dane, UTC, provided a status update of negotiations with the Borough of Hawthorne to J. Peretta, UTC. Maximum settlement including the present value of operating and maintenance costs (O & M) for 20 years/10% would be \$1.2 million dollars. At the time the status update was written, Liberty Mutual had not acknowledged the availability of insurance coverage for this matter.
- June 24 R. Dane, UTC, telephone memorandum. Cost estimate revised from maximum potential UTC settlement of \$1.2 million to \$1.34 million.
- June 25 Newspaper articles from Hawthorne Press and The Record. Articles regarding pesticides in local tap water. Editorial article stated that Dr. Terry Shehata of the State Department of Health stated that Borough water met state standards, but it was his personal opinion that he probably would not allow his children to drink it.
- June 25 Hawthorne Press article regarding noise and odor complaints from Nexus Plastics, 27 Utter Avenue.

- June 26 W. Warren of Warren, Goldberg, Berman & Lubitz, counsel for UTC, provided H. Kachroo, Principal Environmental Engineer for Northern Bureau, NJDEP-DWR, with a brief historical account of the Inmont site: UTC purchased the site in 1980. Records alleged that contamination occurred during the previous 30-year period when Inmont (Interchemical) was engaged in manufacturing activities. BASF bought the Inmont site in 1985. Warren noted that laboratory reports in the Department's files and the files of the Borough seemed to indicate some abatement in the contamination levels measured since UTC purchased Inmont. UTC was a shareholder at Inmont only; the plant was run by Inmont officers and employees. Inmont was always an independent subsidiary of UTC and not a division of UTC. UTC had already spent \$200,000 in investigative work at the site and an additional \$30,000 had been spent sampling the North Wagaraw well field and certain other wells located at Inmont's property. Warren requested that no precipitous action be taken with respect to UTC.
- June 26 Newspaper article from The Record. Article is about living without tap water due to milky pesticides flowing out of taps in homes of Fair Lawn-Hawthorne border. Pesticides of concern included Dursban, chlordane, heptachlor, and lindane. Terminix International, may be associated with the problem since it was the only company nearby that stored or used pesticides.
- June 29 R. Dane, UTC, informed J. Perretta, UTC, (internal memorandum) that UTC retained Barry Ostrager, Simpson, Thatcher, and Bartlett to assist UTC Risk Management and UTC Legal, with resolution of outstanding insurance issues.
- June 29 S. Curtis, Corporate Medical Director, UTC, forwarded his review of an epidemiologic analysis of data regarding the potential association between cases of leukemia/lymphoma and drinking water contaminated by organic chemicals in Hawthorne, New Jersey to R. Dane, UTC. Dr. Curtis agreed with the analysis, and stated that the data does not indicate an alarming incidence of cancer. Dr. Curtis stated that he would forward the data to a consultant in epidemiology, Dr. Daniel Braun of the Industrial Health Foundation, Pittsburgh, Pennsylvania.
- June 30 Newspaper article reported that ten home and business owners already using bottled water due to insecticide-tainted Borough water on Lincoln Avenue may be forced to replace their plumbing systems. The insecticide came from the Terminex Pest Control Company. The chemical clings to the walls of the water main and to dirt and sediment.
- June 30 W. Warren of Warren, Goldberg, Berman & Lubitz, counsel for UTC, to D. Borchard of Evans, Hand, Allabough & Amoresano, counsel for Borough of

Hawthorne. Confirmed meeting with Deieso, MiKulka, Kachroo, Fallon, Commissioner Pasquale, Mayor Ross, Bouchard, representatives from Purcell Associates, and UTC representatives.

- June 30 W. Warren of Warren, Goldberg, Berman & Lubitz, counsel for UTC, requested Borough to provide information relating to the North Wagaraw Road well field from K. Moynahan, Office of Regulatory Services, NJDEP; specifically, the 1979 survey of potentially responsible parties.
- July 2 Newspaper article in Hawthorne Press reported that Calgon Corporation offered to meet with citizens' group.
- July 2 W. Warren of Warren, Goldberg, Berman & Lubitz, counsel for UTC, confirmed meeting on July 8, 1987 between the Borough of Hawthorne and the NJDEP regarding North Wagaraw Road well field, with D. Borchard of Evans, Hand, Allabough & Amoresano, Counsel for Borough of Hawthorne.
- July 6 J. Koutsares, Manager, Risk Management, UTC, informed W. Upham, Supervising Examiner, Special Claims, Liberty Mutual Insurance Company, that the UTC or Inmont policy should provide coverage and expressed dissatisfaction with Liberty Mutual's handling of the case.
- July 6 W. Warren of Warren, Goldberg, Berman & Lubitz, Counsel for UTC informed R. Dane of UTC that a number of documents were secured from the EPA relating to the Calgon Corporation Wagaraw Road site. Information included a list of materials used, purchased, and shipped by Calgon Corporation, and a site map showing drum locations as of June, 1985.
- July 9 Newspaper article, Hawthorne Press. Article reported that Calgon refused to fund a hydrogeological study on the contamination of the Hawthorne Borough Wagaraw Road well field because Calgon favored a different settlement. The article also stated that, according to the NJDEP, BASF/Inmont had signed a consent order and posted a \$1 million dollar bond for the clean-up of the BASF site. Hand-written note by R. Dane, UTC stated that the statement was incorrect - UTC signed the consent order and posted the bond.
- July 10 Internal UTC memorandum: R. Dane requested approval from J. Bouchard to direct payment of \$75,000 to Borough of Hawthorne.
- July 14 R. Dane, UTC, sent a \$75,000 check to J. Pascuale, Commissioner of Public Works, Borough of Hawthorne.



July 14

R. Dane, UTC, provided D. Borchard of Evans, Hand, Allabough & Amoresano, Counsel for Borough of Hawthorne, with a copy of the major elements of the commitment that UTC made at the July 8, 1987 meeting. UTC reiterated that it did not concede that the contamination of the Borough's water supply system was caused, in whole or in part, by Inmont. General terms UTC had committed to are outlined below:

- UTC agreed to pay to the Borough no later than July 22, 1987 the sum of \$75,000 which was to be applied by the Borough against UTC's share of any costs incurred by the Borough in the remediation of its water supply system as set out in Contract 87A published in March 1987;
- UTC agreed to pay, in part, for the capital costs of constructing the water supply remediation project set out in Contract 87A;
- The Borough agreed that payment of UTC's capital contribution may be made over the longest period of time permitted by the NJDEP and will support UTC in its efforts to secure agreement from the NJDEP for as long a pay out period as possible;
- The Borough and NJDEP agreed to try and secure full reimbursement from Inmont-BASF for operational and maintenance costs of the remedial system referred to in Contract 87A. The Borough and NJDEP agreed to seek reimbursement of such costs from UTC only if they have been unable to collect them from Inmont/BASF;
- The Borough and NJDEP agreed that UTC shall have no further obligation in connection with the remediation of the Borough water supply system necessitated by volatile organic compounds in concentrations of 200 parts per billion or less per compound;
- The Borough subrogated UTC to all claims which the Borough may have in the future for recovery from any other person or entity of some or all of the payments made by UTC pursuant to this undertaking;
- UTC agreed to discuss with the Borough payment for some or all of the costs incurred by the Borough in connection with the design of a vapor phase treatment system (according to the allocation formula); and

- UTC agreed that if all issues were resolved per this undertaking prior to the execution of Contract 87A, UTC would pay to the Borough a further \$100,000.

July 15 D. Borchard of Evans, Hand, Allabough & Amoresano, Counsel for Borough of Hawthorne, informed H. Kachroo, Principal Environmental Engineer for Northern Bureau, NJDEP-DWR, that an agreement in principle was reached between UTC and the Borough of Hawthorne for payment of a proportionate share of the capital remediation costs of the proposed treatment facilities for Hawthorne Borough water supply system.

July 15 A. Knight, Assistant General Counsel, Calgon, provided D. Borchard of Evans, Hand, Allabough & Amoresano, counsel for Borough of Hawthorne, with a copy of the agreement-in-principle negotiated with the Borough of Hawthorne. The agreement concerned Calgon's contribution to the cost of the Borough's water treatment system. It included:

- Calgon would pay 32% of the capital costs of a water treatment facility for a 20-year period. The capital costs would be determined based on a treatment system designed by Purcell Associates and approved by the NJDEP; and
- A sum of \$50,000 was to be paid prior July 24, 1987 and \$100,000 within ten days of the letting of the contract for the construction of the treatment facility.

July 16 D. Borchard of Evans, Hand, Allabough & Amoresano, Counsel for Borough of Hawthorne, provided H. Kachroo, Principal Environmental Engineer for Northern Bureau, NJDEP-DWR with a copy of the agreement-in-principle negotiated with the Borough of Hawthorne concerning Calgon's contribution to the cost of the Borough's water treatment system for the South Wagaraw well field.

July 20 R. Dane, UTC, informed W. Parker and M. Schneidermeyer, UTC, through an internal memorandum that the 1979 Industry Survey of Hawthorne by NJDEP did not identify Inmont as a "strong" suspect in groundwater contamination. There were, however, over nine companies in the vicinity of the Wagaraw Road well field that potentially used chlorinated solvents that were not investigated. Two sites were cited for obvious spills: Calgon Corporation and Sandvik, Inc.. Included within this survey were all the industries and companies and their associated process and chemicals used.

July 23 R. Dane, UTC, informed W. Parker, J. Perretta, and M. Schneidermeyer, UTC, that H. Kachroo, Principal Environmental Engineer for Northern Bureau, NJDEP-DWR, indicated that a BASF settlement could range from \$170,000 to \$250,000.

July 23 G. Hill, BASF, notified the Corporate Secretary for UTC that UTC was liable for a \$233,720 claim made against BASF by NJDEP for alleged contamination of the Borough of Hawthorne municipal wells, according to the UTC-BASF Stock Purchase Agreement, Sections 3.15 (a), 5.6 (a), and 5.6 (b).

July 28 W. Warren of Warren, Goldberg, Berman & Lubitz, Counsel for UTC, forwarded a copy of Malcolm Pirnie's February 20, 1985 report on the Hawthorne Borough Well Fields to R. Dane, UTC. The Borough wells sampled showed the presence of: 1,1,1 trichloroethane (6 ppb), trichloroethylene (28 ppb), tetrachloroethylene (1 ppb), and 1,2-dichloroethylene (1 ppb).

Malcolm Pirnie (1985) suggested that organic contaminants entered Hawthorne's well field via bedrock fractures.

A list of industries around the municipal wells were noted. In addition to UTC Inmont and Calgon, Owens Illinois Building 6 (with 3 tanks) was located west of the well field. Fisk Alloy Wire, Inc., Computer Crafts Inc., Markbilt Inc., Fisetek, and Hawthorne Prints were also located west of the Borough's well field. Aerospace, Continental Aromatics, and Dim Filter Corporation were located southwest of the municipal wells.

August 7 SES, BASF Inmont Facility. Prepared by O'Brien & Gere.

Building 2 Hazardous substances generation area (laboratory)  
Hazardous substances storage area (former location of PCB transformers)

Building 3 Hazardous substances storage area (raw material in 55-gallon drums)  
Hazardous substances loading/unloading area (product and raw material loading/unloading area)

Building 4 Hazardous substances handling area (flush base pigments)  
Hazardous substances storage area (AST- varnish tank)

Building 6 Hazardous substance manufacturing area (Pigment)

Hazardous substance loading/unloading area

- Building 6A Hazardous substance handling area (Pigment presscake drying)
- Building 7 Hazardous substance handling area (Pigment milling/blending and packaging)
- Building 9A Hazardous substance manufacturing area (ink dispersion)
- Building 10 Hazardous substance storage area (PCB-contaminated transformer - less than 500 ppm)
- Building 11 Hazardous substance storage area (PCB-contaminated transformer - less than 500 ppm)
- Building 25 Hazardous substance storage area (pilot plant)  
Hazardous waste disposal area (pilot plant waste water sump)
- Building 27 Hazardous substance storage area (AST-varnish tank)
- Building 30 Hazardous substance storage area (general warehouse)  
Hazardous substance storage area (AST- ink tanks)

Hazardous Waste Areas - General

- Hazardous substance storage area (AST- fuel oil tanks)
- Hazardous substance storage area (former Tank Farm 2)
- Hazardous substance storage area (AST- sulfuric acid)
- Hazardous substance storage area (AST- hydrochloric acid)
- Hazardous substance storage area (AST- sulfuric acid)
- Hazardous substance/waste storage area (raw material: 55-gallon drums)
- Hazardous substance treatment area (acid neutralization system)
- Hazardous waste storage area (UST- Xylene waste tank)
- Hazardous waste storage area (excavated soil from Tank Farm No.2)
- Hazardous substance loading/unloading area (tanker car raw material unloading area)
- Hazardous substance loading/unloading area (product and raw material loading/ unloading area)

- August 11 BASF, SES (O'Brien & Gere). Between August 1985 and November 1986 BASF manufactured pigments from a range of intermediates. The facility produced aqueous dispersions and flush bases from these pigments as well as specialty printing inks. Operations were based on the synthesis of azo pigments and processing of phthalocyanine blue pigment. Azo compounds, which can be yellow, orange, or red, were formed by reacting monoazo or diazo compounds with naphthols or arylides. Blue phthalocyanine pigments were dispersed in organic systems. All reactors were constructed of rubber lined carbon-steel, stainless steel, or fiber reinforced plastic varying in size from 500 to 13,000 gallons.
- Pigment synthesis and filtration, and water-based pigment dispersion were performed in Building 6; presscake drying, milling, packaging and blending of dry pigments were performed in Building 6A and 7. Building 4 was used for the preparation of pigment flushes. Buildings 4, 6, 6A, 7, 9A, 25, 30, and 31 were used in manufacturing processes and storage operations.
- In contrast, in addition to the above processes, UTC Inmont produced dyestuffs, dyestuff intermediates, pigment intermediates, specialty polymers, and chemicals. These products were discontinued when Inmont (Interchemical) sold its dyestuff business to Sandoz in 1974, and its organic chemicals division to Aceto Chemical in 1967. Most production took place in Building 5.
- BASF excavated Underground Tank Farm No. 2 in 1986. The 3000-gallon xylene solvent waste tank (Tank No. 47) was also removed. A pump house foundation located adjacent to Building 10 contained a polymerized styrene compound; the foundation was left in place.
- Table 8 summarizes the ASTs associated with the BASF Inmont facility; Table 9 summarizes UST associated with the BASF plant. Table 10 shows contrast of use by BASF and UTC of various buildings at the Inmont site.
- August 20 Article in the Hawthorne Press identified Pyrolac Corporation and Trilectron Industries as being cited by state NJDEP for clean-up. Pyrolac was cited because the firm's "discharge of pollutants and hazardous substances on the site threatened municipal wellfields and private wells in the borough." Trilectron was associated with hazardous waste.
- August 31 A. Knight, Merck & Co., requested Tom Hays, BASF, to permit access to the Weidman Silk Mill wells on the BASF-Inmont property.

Table 8: Aboveground Storage Tank Inventory  
BASF Corporation, Hawthorne, New Jersey.

HAZARDOUS SUBSTANCE STORAGE		
Size (Gallons)	Description	Location
60,000	No. 6 Fuel Oil, Diked, Approximately 14,000-gallons remain serving the boiler house (Bldg. 8)	East of Bldg. 27
60,000	No. 6 Fuel Oil, Diked, Approximately 14,000-gallons remain serving the boiler house (Bldg. 8)	East of Bldg. 27
15,000	Sulfuric Acid, Diked, empty	Southeast Corner of Bldg. 6
15,000	Hydrochloric Acid, Diked, 2,000 gallons remaining	Southeast Corner of Bldg. 6
8,000	Ink Product, Mineral Oil Based, Empty	Inside Bldg. 30
8,000	Ink Product, Mineral Oil Based, Empty	Inside Bldg. 30
8,000	Ink Product, Mineral Oil Based, Empty	Inside Bldg. 30
8,000	Ink Product, Mineral Oil Based, Empty	Inside Bldg. 30
20,000	Varnish, This Tank was Separated into Four (4) Equal Vessels for Varnish Storage, Empty	Inside Bldg. 27

Source: O'Brien & Gere, ECRA-SES, August 11, 1987.

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Table 8: Continued

HAZARDOUS SUBSTANCE STORAGE		
Size (Gallons)	Description	Location
1,200	Sulfuric Acid, Diked, Empty	East of Bldg. 8
23,500	There are Ten (10) Tanks for Varnish Storage, Empty	Adjacent to East Wall of Bldg. 4
5,000	Empty, Diked, Unused by BASF, Used for Acid Storage during UTC Ownership	Southeast Corner of Bldg. 6
NON-HAZARDOUS SUBSTANCE STORAGE		
6,500	New Tank, Unused, Empty and Diked	Southeast Corner of Bldg. 6
6,500	New Tank, Unused, Empty and Diked	Southeast Corner of Bldg. 6
6,000	Latex, Empty	Roof of Bldg. 4
12,000	Latex, Empty	Roof of Bldg. 4

Source: O'Brien & Gere, ECRA-SES, August 11, 1987.

BAKER ENVIRONMENTAL, INC. 04-92

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Table 9: Underground Storage Tank Usage,  
Hawthorne, New Jersey.

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985	Notes
29	1950	15,000	Turpentine	Solvenol 226	Solvenol 226	Empty	
30	1950	15,000	Solvesso 100	Solvesso 100	Solvesso 100	Empty	
31	1950	13,500	Melamine	Resimeme K896	Resimeme K896	Empty	Resimeme K896 = petroleum hydrocarbon
32	1950	13,500	Pine Oil	Pine Oil	Pine Oil	Empty	
33	1950	10,000	Octyl Alcohol	Octyl Alcohol	Octyl Alcohol	Magie 470 Oil	Magie Oil = petroleum hydrocarbon
34	1950	10,000	Solvesso 100	Solvesso 150	Mineral Oil	Empty	
35	1957	7500	Mineral Oil	470 Oil (Magie?)	Magrisol 52	Magie 500 Oil	
36	1957	2500	Ink Oil	Aquasol GS	Magrisol 52	Magie 500 Oil	Ink Oil = Petroleum distillate
37	1957	5000	Xylene	Xylene	Xylene	Xylene	
38	1957	5000	Varsol	Varsol #2	Varsol #2	Empty	

Note: All tanks are/were constructed of carbon steel.

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Source: Lan Associates, 1985



Table 9: Continued

Tank No.	Year built	Capacity (gallons)	Original Use	1970	1975	1985	Notes
39	1957	10,000	Spare	Solvenol 226	Empty	Empty	
44	1969	5000		440 Oil	Hydrosol 47	Magie 470 Oil	
45	1969	5000		Vaporin Sol'N 0431	Gulf 896 Oil	Empty	
46	1969	10,000		Empty	Empty	Empty	
47	No Data	6000				Waste Xylene	
48	No Data	1000			Heat Transfer Oil	Empty	

Note: All tanks are/were constructed of carbon steel.

Source: Lan Associates, 1985

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844230229

Table 10: Comparison of BASF and UTC use for Buildings 3, 5, 25, 30, and 31.

Bldg. No.	BASF Use	UTC Use	Notes
3	Storage		Raw materials: 55-gallon drums, 5-Gallon pails, 50-pound bags
	Drum storage		Indoor
5	Drum storage		Outdoor- b/w Bldgs. 5 and 25
25	Storage	Pilot Plant	Raw materials
	Not Used	Waste water sump	N/A
30	Drum storage		Indoor
	Warehouse		Storage- finished goods, some raw materials (indoor and outdoor)
31	Drum storage		Adjacent to Bldg. 31

BAKER ENVIRONMENTAL, INC. 04-92

- September 4 J. Gebrian, BASF, provided a copy of the Merck & Co. letter to R. Dane, UTC. Concern that if Weidman wells were located, a request for sampling would follow.
- September 28 J. Gebrian, BASF, provided E. Kuhlwein, Chief, Bureau of Hazardous Waste Engineering, NJDEP, with Amendment No. 1 to the RCRA Closure Plan for Hazardous Waste Storage Area and Underground Storage Tank, BASF Corporation, Hawthorne N.J.

BASF submitted a Closure Plan on August 11, 1986. In a letter dated July 8, 1987, NJDEP requested that additional information be incorporated into the Closure Plan. BASF retained O'Brien & Gere to prepare the Amendment to the Closure Plan. Amendments included:

- Drum Storage Area: During an August 1987 inspection of the concrete drum storage pad, four areas were identified where the concrete pad no longer functioned as an impervious cover. BASF planned to core the concrete at these locations and sample the soil between 0 and 6 inches below the concrete. They proposed that if the soil was visibly contaminated, additional post-excavation sampling would be performed. Eight samples were to be collected around the perimeter, biased according to pad drainage;
- UST: Excavated soils were to be stored on, and covered with, polyethylene sheeting. If visibly contaminated soils were removed, post excavation sampling would be conducted; background levels of volatile organics were to be obtained. Personnel Protection was to be upgraded as appropriate (five times background level);
- Sampling objectives and analytical parameters were also updated; and
- NJDEP-requested changes for the implementation of a groundwater monitoring system for the USTs were not made. BASF/O'Brien & Gere questioned the technical feasibility of a groundwater monitoring system, cited site conditions, and the fact that the tank was tested and no leaks were detected.

- October 1 Hawthorne Press article "Construction in Progress". Work on the first stage of the Borough's water treatment facilities had begun; labor on the second phase was to scheduled to begin. Two contracts were made for the water treatment system: 87A and 87B called for two packed air towers at the south end of Hawthorne and

transmission lines to connect the wells; and 88A and 88B which would require one packed air tower and water transmission lines at the northern end of Hawthorne. Both contracts were awarded to Frank A. McBride Company for the air-strippers and to Garcia Construction for the transmission lines. The work was to be supervised by Purcell Associates. Calgon agreed to contribute approximately \$500,000 toward both the capital costs and operating and maintenance charges, BASF/Inmont would provide \$234,000, and UTC pledged \$400,000.

- October 8 Internal Correspondence, UTC. R. Dane requested approval for authorization to forward \$400,000 toward remediation of contaminated water supplies in Hawthorne, N.J.
- November 5 R. Dane, UTC to J. Pascuale, Commissioner of Public Works, Borough of Hawthorne. Terms and conditions of a written agreement between UTC and the Borough of Hawthorne were resolved and the document itself was to be finalized. A check for \$100,000 was enclosed.
- November 9 J. Gebrian, BASF, provided three copies of the BASF Closure Plan (including amendments) to E. Kuhlwein, NJDEP.
- December 1 W. Warren of Warren, Goldberg, Berman & Lubitz, Counsel for UTC, to D. Borchard of Evans, Hand, Allabough & Amoresano, Counsel for Borough of Hawthorne. Outstanding issues were resolved between R. Dane, UTC and J. Pasquale, Commissioner of Public Works, Borough of Hawthorne. The release agreement stated that UTC was released from responsibility for only those substances or compounds that can be stripped.
- December 2 D. Farley, Hart Associates, provided analytical results from groundwater monitoring wells at the BASF Inmont facility to E. Fox, NJDEP. Groundwater sampling was conducted between April 29 and May 5, and August 25 and 27, 1987. Thirty-seven monitoring wells were sampled for volatile organic and base/neutral compounds. Significant concentrations of toluene, nitrobenzene, chlorobenzene, and 1,2,4-trichlorobenzene were reported. The report also included figures showing the extent of contamination in both the overburden and bedrock aquifers. Figures were provided for: nitrobenzene; benzene, chlorobenzene, ethylbenzene, and toluene; and TCE, PCE, and 1,1,1 TCA.
- December 16 UTC News Release. UTC agreed to provide \$400,000 to the Borough of Hawthorne, New Jersey, to assist in the construction of a water purification

system for the community. UTC presented \$175,000; an additional \$225,000 was due by March, 1988.

December 17 R. Corcory, NJDEP-DHWM notified UTC that an administrative consent order was issued to UTC which outlined the findings of the problem at the Inmont site.

No Date Bucek & Ebaugh, Hydrogeologists, reported that Calgon was not the source of VOC contamination of the Hawthorne Borough well field because:

- Calgon never used the contaminants,
- groundwater flows southward beneath Hawthorne toward the Calgon site, and
- the shape of the contaminant plume showed a source (or sources) located up to two miles north of Calgon.

Bucek & Ebaugh stated that flow direction was controlled by the north-northeast to south-southwest direction of fractures in the red sandstone and shale of the Brunswick Aquifer tapped by the Hawthorne Borough wells. Gravity drives groundwater flow south to the Passaic River from higher elevations to the north of Hawthorne.

844230234

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1988**

1988

- January Specifications for Decommissioning and Demolition Work Plan, prepared by O'Brien & Gere. The Work Plan outlined the proposed decommissioning and decontamination of eleven buildings, limited decontamination and demolition of ten buildings, temporary storage and disposal of wastes generated during decommissioning and demolition activities, backfilling of three below grade process areas, and proper grading and paving of specific demolition areas following completion of the proposed program.
- The proposed Scope of Work included waste classification, asbestos removal, removal of dust collectors and cleaning of duct work, decontamination activities, and isolation of plant services/utilities. BASF was responsible for locating electric lines and pipelines (including draining locking valves/lines; draining and/or removal of process pipe lines); demolition activities; and decommissioning activities.
- January 5 J. Ash through D. Muscalo, Supervisor, Bureau of Ground-Water Pollution Analysis. NJGS recommended through an internal memo that the Hawthorne well field be subdivided into three units to more accurately define the aquifers in this area. The proposed subdivisions were: Southern Hawthorne Wells - consisting of the four South Wagaraw wells, seven North Wagaraw wells, and the three wells due north of the North Wagaraw well field (Elberon, Maitland, and Cedar Avenue wells); Middle Hawthorne wells - consisting of the Utter, Rea, Bamford, and Grand Avenue wells; and the Northern Hawthorne wells - consisting of the six Main wells. A figure showing the locations of the wells was attached.
- February 5 R. Dane, UTC, forwarded a check for \$112,500 to J. Pascuale, Commissioner of Public Works, Borough of Hawthorne.
- February 8 R. Dane, UTC, requested authorization for payment of \$112,500 from J. Bouchard, UTC, to complete the \$400,000 well field remediation agreement between the Borough of Hawthorne and UTC.
- April 15 J. Pasquale, Commissioner of Public Works, Borough of Hawthorne, attempted to recover \$1361.25 from BASF for base neutral analyses performed on samples obtained from monitoring wells at the Inmont site performed by Laboratory Resources, Inc.
- April 25 F. Coolick, NJDEP, notified J. Gebrian, BASF, Chemicals Division, that NJDEP had reviewed and approved the revised Closure Plan (November 9, 1987), for the



RCRA UST and RCRA drum storage pad. NJDEP instructed BASF to conduct closure activities according to N.J.A.C. 7:26-9.8 and the following site-specific conditions:

- All hazardous wastes were to be removed from the drum storage area and from the UST (including associated piping) and disposed of off-site at an authorized facility - disposal and decontamination were to take place within 90 days from the date of Plan approval;
- The method of decontamination was to include washing with a caustic solution and vacuuming;
- Soil sampling and analysis were to take place within 120 days from Plan approval;
- The SAP was to address cracks in the storage pad; 10 soil samples were to be obtained from the perimeter of the pad, and five samples were to be taken from the excavation associated with the UST removal;
- Completion of closure activities must occur within 180 days from date of Plan approval;
- BASF was to obtain all relevant permits; and
- Provide written certification by a registered professional engineer (including seal and signature) and the owner/operator, within 210 days of Plan approval.

June 2      W. Warren of Cohen, Shapiro, Polisher, Shiekman & Cohen, Attorney for Claimant (United Technologies Corporation) a filed Spill Compensation and Control Act Damage Claim in connection with alleged discharges in the vicinity of the Wagaraw Road well field of the Borough of Hawthorne.

June 2      Calgon Corporation entered into an Administrative Consent Order with NJDEP. The ACO stated that:

- According to Dames and Moore (August 7, 1980), there were three aquifers at the site - an aquifer above a clay layer, the alluvial sediments [overburden] aquifer, and the bedrock aquifer;
- Soils at the site were contaminated with mercury;

- All three aquifers were contaminated with mercury and various hydrocarbons;
- Low concentrations (0.002 to 0.01 ppm) of mercury in the groundwater compared to soil (0.5 to 180 ppm) suggested that mercury was "relatively immobile" and was leaching very slowly;
- The hydrocarbon source area could not be determined at the time the ACO was prepared;
- Based on pumping test data during the D&M (1980) investigation, there were two aquifers: an unconsolidated aquifer and a bedrock aquifer and were, at a minimum, partially hydraulically connected. The clay lens, present on the western side of the property created a perched water table;
- The groundwater beneath the Calgon site was contaminated with:

benzene	methylene chloride
toluene	1,1 dichloroethane
tetrachloroethylene	1,1 dichloroethylene
vinyl chloride	chlorobenzene
trichlorethylene	1,2,4 trichlorobenzene
mercury	

- Calgon was required to conduct an RI/FS to determine sound remedial actions at the site, and implement a remedial action plan;
- Calgon must submit a detailed Preliminary Remedial Investigation Report;
- Calgon must submit and implement an Interim Remedial Measures Work Plan;
- Calgon must submit a detailed Remedial Investigation Work Plan;
- Calgon must conduct a Remedial Investigation, and submit a report detailing findings;
- Calgon must conduct additional remedial investigation tasks as required by NJDEP;

- Calgon must prepare a Feasibility Study Work Plan;
- Calgon must conduct a Feasibility Study;
- NJDEP must select the remedial action alternative;
- Calgon must prepare a Remedial Action Plan;
- Calgon must implement the Remedial Action Plan;
- Calgon must conduct additional remediation as required by NJDEP in order to protect human health or the environment; and
- Calgon must submit quarterly progress reports;

Additional requirements, such as financial obligations and general provisions were also included in the ACO.

June 15? Administrative Consent Order with United Technologies Corporation. Short historical study of site. Consent order outlined.

July 20 W. Mock, Jr., Site Manager, BASF, informed E. Fox, NJDEP, that the BASF ECRA Notice was completed on September 18, 1987. W. Mock stated that BASF had previously expressed its intent to accelerate the ECRA decommissioning/demolition program. However, NJDEP had not responded to BASF's request for an NJDEP site visit. W. Mock requested a response from NJDEP.

July 26 A BASF contractor discovered 8 lines above the RCRA UST waste xylene during excavation. Five lines were horizontal, three lines were vertical. BASF suggested that the five horizontal lines were used to transfer materials from Tank Farm 2, and the three vertical lines were fill pipes or vent lines associated with the RCRA UST.

The lines were sampled; unknown organics, ethylbenzene, and xylene were found; BASF noted concentrations as "percent based on wet weight to volume". The five horizontal pipes showed the presence of xylene, petroleum distillate, and mineral spirits. BASF suggested that these materials were stored in bulk in Tank Farm No.2 and may have been disposed of in the RCRA UST. They further state that it was not possible to differentiate contamination found beneath the tank from contamination discovered in the soils above the tank. The vertical lines showed

elevated concentrations of volatile organics, petroleum hydrocarbons, and base neutrals.

BASF stated that the eight lines later had to be flushed and partially dismantled in order to access the RCRA UST for excavation.

BASF noted that the RCRA UST was used by BASF to store red and yellow pigment-xylene mixtures and that any leakage of the material would be readily apparent. They also noted that the soil smelled of solvent, similar to the smell noted when the horizontal transfer lines were flushed and dismantled.

August 15 Meeting: NJDEP - Bureau of Groundwater Quality Management and BASF. BASF presented data from RCRA UST closure activities.

August 23-25 BASF implemented approved Closure Plan; the RCRA UST was removed; visually contaminated soil was removed; confirmation samples were obtained.

November 23 R. Cawley, Project Hydrogeologist, O'Brien & Gere, prepared and submitted a letter report to F. Coolick, NJDEP, describing activities associated with the RCRA Closure Plan dated November 7, 1987. Sampling was conducted at the RCRA storage pad and UST.

RCRA Storage Pad: Soil sampling at the RCRA storage pad was performed on July 18, 1988. C. Miller, Field Auditor, NJDEP was present during the sampling effort. Two of the original ten samples (required by NJDEP) were omitted with NJDEP Field Auditor approval. In addition, BASF also collected samples from the area of the RCRA storage pad where it no longer served as a vertical barrier. A total of twelve soil samples were obtained; these samples showed residual concentrations of volatile organics (including toluene), petroleum hydrocarbons (50 to 4400 ppm), metals and base neutrals. Metals that BASF stated were of concern were cadmium, chromium, copper, lead, mercury, nickel, and zinc.

RCRA UST: BASF removed what they believed were former solvent transfer lines located above the RCRA tank. The lines were 6 to 12 inches below grade. They were cut back approximately 10 feet from the excavation area. The top and sides of the tank were exposed on August 24, 1988; post-excavation soil sampling and UST removal were conducted on August 25, 1988. Soils above the tank were reported as having a distinct solvent-like odor; the odor was first observed 2 feet below grade. During UST excavation, three 3-inch ID [latex process] lines and two 2-inch ID [former solvent transfer] lines were found. The two 2-inch

[solvent transfer] lines were located directly over the RCRA UST; they were flushed and cut away from the UST excavation. The three 3-inch [latex process] lines were left in place. BASF stated that the [solvent] lines were remnants of the former underground Tank Farm No.2 (located east of the RCRA UST). Lines from Tank Farm No.2 ran above and below grade to Building 4. BASF stated that stained soil and odors observed during the RCRA UST excavation were associated with the below grade piping.

A light blue surficial soil stain was observed immediately below the UST.

The RCRA UST was removed with a backhoe and accidentally punctured in two places; therefore, tank integrity could not be tested. BASF reported that no evidence of breaks, cracks, or other structural damage was noted during inspection.

Approximately 50 cubic yards (cy) of soil were excavated during tank removal. The tank and excavated soil were disposed of as hazardous waste.

Analytical results indicated residual concentrations of volatile organics (ethylbenzene: 38,000 ppb; methylene chloride: 2400 ppb; toluene: 1400 ppb; meta-xylene: 100,000 ppb, and para-, ortho- xylene: 110,000 ppb), petroleum hydrocarbons (50 to 6000 ppm), and base neutrals (naphthalene: 33 to 200 ppm) were present beneath the RCRA UST.

December 30 T. Hays, Senior Attorney, BASF, commented on the UTC Draft ECRA Sampling Plan results prepared by Hart for the Inmont facility. BASF stated that groundwater remediation should begin, and that steps should be taken to control the spread of contamination. BASF also stated that its ECRA activities must also be addressed in the UTC submittal, particularly the "pit" under the demolished Building (6?), and the discovery of high levels of contaminants in shallow groundwater.

844230242

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1989**

1989

- January 11 K. Koneval, BASF, notified (facsimile) P. Kaminski, UTC, of a site tour by E. Fox, NJDEP-ECRA on January 11, 1989 at 7:30 a.m. Areas of particular concern were the Building 6 pits, sumps, and ground level floor. BASF stated that any contaminants associated with the sumps, pit, and any other area (including grade) should be dealt with as part of the UTC groundwater remediation effort.
- January 24 K. Koneval, BASF, provided a summary of the NJDEP-ECRA inspection of January 13, 1989 to E. Fox, NJDEP. The BASF/NJDEP meeting yielded several areas of "mutual understanding":

- Groundwater contamination was the result of prior operations;
- NJDEP approved backfilling and paving over of the Building No. 6 pit;
- NJDEP agreed that BASF's line of demarkation was at grade;
- NJDEP favored removing obvious areas of concern from the floor area of Building 6 - checked or cracked concrete was to be removed;
- A deed restriction clause for the property was probable;
- Stains around the PCB transformers next to Building 4 should be cleaned to visually clean; soils between 0 and 12 inches below grade should be removed from the perimeter of each transformer; and
- BASF should perform the soil removal and keep records - NJDEP considers 100 ppm TPHC and 1-5 ppm PCBs as "clean".

NJDEP was to perform a final ECRA site inspection when BASF completed the above tasks. BASF estimated that the Building 6 pit would be filled by February 8, 1989.

NOTE: January 1989 Progress Report - Calgon Corporation was NOT INCLUDED IN NJDEPE FILES at the time the file was reviewed by Baker Environmental, Inc., December 4, 1991).



- February 6 Interoffice BASF memorandum to D. Lierman from R. Zollner. D. Lierman provided an inspector's checklist used by NJDEP Hazardous Waste Inspectors, and an "auditors" checklist used by NJDEP auditors for assessing nationwide TSD's concerning generator liability. Suggested use of these lists for upcoming Calgon audit.
- February 7 K. Koneval, BASF, provided P. Kaminsky, UTC, with a copy of BASF's ECRA documentation for UTC comment.
- February 22 Letter to E. Fox, NJDEP, from BASF. River silts from river water intake contains lesser dioxin (hepta, hexa, and octa-dioxin).
- March ECRA Sampling Plan Results for Former Inmont Facility, Hawthorne, N.J., prepared by Hart Associates, Inc.
- Report summarized past studies; suggested that potential source areas (such as contaminated soils) have not been fully characterized, and delineation was necessary for remedial purposes.
- May 11 Interoffice BASF memorandum to K. Koneval and W. Papy from K. Hillig - six samples analyzed for PCBs and TPHC on April 17 (TPH - methods 503 D and E; PCB - method SW 846). PCBs ranged between 3.2 and 4074 ppm and TPHC ranged between 625 and 260,000 ppm. The location of samples were not noted.
- June 1 BASF submitted a letter and report to K. Moynahan, NJDEP (BASF letter to F. Coolick, NJDEP, was attached) in support of BASF request to terminate NJPDES permit monitoring.
- BASF submitted a Closure Report to NJDEP and referred to the August 15, 1988 meeting between NJDEP and BASF. BASF implemented the approved closure plan - the RCRA UST and visually contaminated soil was removed between August 23 and August 25, 1988. Confirmation sampling was also conducted.
- BASF submitted a summary of events and results of the RCRA tank removal activities to NJDEP on November 23, 1988. The BASF report stated that contamination at the site was not the result of RCRA tank activity because upgradient/downgradient wells had similar concentrations of contaminants. BASF also stated that MW 5-88, a nearby monitoring well, contained a one-foot thick floating product; BASF suggested that the floating product was varnish from nearby tanks.

The floating product and varnish from Building 4 were fingerprinted - BASF stated that the two substances were very similar. Therefore, BASF concluded that the floating product in MW 5-88 was the result of spills associated with the varnish AST, and with leakage from transfer lines associated with Buildings 4 and 27. In addition, the floating product in MW 5-88 was black, and should stain soil; no staining of this nature was encountered during tank removal.

BASF argued that since there were multiple contaminant sources in the vicinity, absolute determination of the RCRA tank as a source of contamination of the area was not appropriate. They stated that since the entire area was contaminated, NJPDES monitoring should be discontinued.

BASF installed five monitoring wells near the waste xylene-RCRA UST. In general, groundwater showed the presence of xylene, ethylbenzene, and naphthalene. BASF stated that these compounds were consistent with product stored at Tank Farm No.2.

The concrete drum storage pad was used by BASF to store a maximum of sixty (60) 55-gallon drums containing non-reactive dust-collector material contaminated by lead-chromate pigment. The material was considered hazardous due to elevated levels of lead and chrome (EP Toxicity).

June 22 K. Koneval, BASF, notified G. Sondemeyer, NJDEP, that 105 cubic yards of solid waste (identification number 27) was generated by the clean out of river silt from the river water intake filters. The river silt contained small quantities of dioxin. The letter requested permission to dispose of the waste and stated that Chemical Waste Management, Rollins Environmental Services, Thermalkem, GSX, EnviroSAFE, and Wayne Disposal were several companies that could provide disposal services.

July 13 K. Koneval, BASF, notified P. Kaminsky, UTC, that UTC should address specific issues in its ECRA plan, such as:

- Removing the stained soil along the pump house access road - the stains appeared to be either a dye or pigment;
- Removing the stained soil around the Building 10 main electrical transformers, and taking post excavation samples;
- MW 5-88 monitored the former RCRA UST and was found to contain floating product; analysis indicated that floating product was varnish

mixed with mineral spirits. Historic site plans show that subsurface varnish piping and above ground varnish tanks existed in the vicinity of the monitoring well;

- Tank Farm No.2 [transfer] lines were located above the BASF RCRA UST. Soil around the transfer lines was stained and had an obvious solvent odor;
- Soil samples around the base of the former RCRA drum storage pad showed the presence of priority pollutant metals, base neutral parameters, PCBs, and TPH. BASF has no documented spills at the storage pad. BASF excavated a 3 foot deep by 3 foot wide trench on accessible sides of the drum pad; and
- Following heavy rains during the first two weeks of May, fluorescein discharged from the storm sewer drain. BASF suggested that UTC determine the source of the fluorescein and remediate.

July 19 K. Koneval, BASF, submitted a fully executed copy of the Supplemental Information Document (Contract #E05-436-89-2) to L. Langlais, Chemical Waste Management (CWM). The form covered waste products for the Hawthorne Facility, Waste code designation H44725. A May 25, 1989 letter (attached to the original document) from L. Langlais, CWM, to BASF Inmont Corporation, states that CWM will accept all waste identified by profile number H44725 MDC. (Contract attached- May 25 letter from CWM stating that no changes can be made to this contract).

July 20 K. Hart, Chief, Bureau of Environmental Evaluation and Cleanup Responsibility Assessment, HWM- NJDEP, partially approved the Supplemental Sampling Plan dated March, 1989 for the Inmont facility. The hydrogeologic investigation was approved, but soil sampling results were found to be unacceptable due to improper QA/QC methods. Twenty comments were provided, and ECRA Standards for Data Requirements, Presentation, and Proposals were also outlined.

Inmont was instructed to address the comments on the soils and additional ECRA conditions and submit a Sampling Plan Addendum within 30 days. Inmont was also directed to implement the approved hydrogeologic sampling plan and submit the results within 120 days.

Case Manager: Chris Neuffer.

- August 21 W. Leiken, UTC, provided T. Hays, BASF, with NJDEP comments regarding UTC's ECRA submittal regarding the Hawthorne Facility.
- August 23 J.F. Rogauskas, NJDEP, notified K. Koneval, BASF, that BASF received an unacceptable rating for the Compliance Evaluation Inspection conducted on June 14, 1989 because:
- TSS permit level of 20 mg/l, was exceeded in January 1989 (40 mg/l) and in February 1989 (31 mg/l); and
  - PHC permit level of 10 mg/l, was exceeded in February 1989 (34 mg/l - average, and 66 mg/l - maximum).
- August 25 P. Kaminisky, Corporate Environmental Engineer, UTC, provided UTC's responses to conditional approval for the Inmont Hawthorne ECRA facility Sampling Plan. Case No. 85563. NJDEP's 20 comments were addressed; a revised Supplemental Sampling Plan Addendum was included.
- September 5 Site Evaluation Submission (SES), Calgon Metasol Plant, 200 Wagaraw Road, Hawthorne, N.J.

Weidman Silk Dyeing	? to 1945
Metasol Corporation	1945 to 1966
Merck & Co.	1966 to 1978
Calgon	1978 to present

The Request for Hydrogeologic Assessment - ECRA Program (Form: ECRA-002A 12187) noted that the Hawthorne City wells are 330 and 745 feet from the edge of the Calgon Property; both wells are 300 feet deep.

The SES noted that coal ash and waste were dumped at the property prior to 1945. After 1945 the plant produced mercurial and non-mercurial organic compounds.

(A detailed site history is described in the January, 1991 entry).

Raw materials used in the manufacturing processes at the Calgon Metasol Plant were only reported for selected years, 1957, 1968, 1976, 1986. Calgon reported that over years of plant operation, many different raw materials had been used in the various manufacturing processes; only materials used over long-term operations were included. No list was included in this document.

### Description of Operations

The Calgon plant most recently manufactured water treatment chemicals (SIC 2899) and biocides (SIC 2879).

The facility has two manufacturing buildings, two warehouses, two major tank farm areas, and one satellite drum and container storage area.

- Building 1:
  1. Monomer manufacturing area
  2. Polymer manufacturing area
  3. Blending room
  4. Oven draining and packaging
  5. Maintenance shop
  6. Locker rooms, lunch, offices
  7. Laboratory
- Building 2:
  1. Two explosion-proof rooms (middle, back)
  2. Oven (mezzanine)
  3. Quenching vessels
  4. Out-door operating areas

Hazardous materials at the facility were protected by secondary containment areas, except for two fuel tanks and one gasoline tank.

The Calgon facility manufactured dimethyl diallyl ammonium chloride (DMDAAC), a monomer used as a building block for water treatment polymers. DMDAAC was created by the reaction of allyl chloride with 60% dimethylamine in the presence of caustic soda. The reaction took place in an inert, totally enclosed system. The allyl chloride and dimethylamine storage tanks were equipped with cathodic protection and located inside a concrete bunker with a sump monitor well; the entire system was covered with dirt.

Building 1 housed a cubicle and an unloading area where allyl chloride was used. Additional processes conducted in Building 1 included the polymerization of DMDAAC polymers (in the presence of a catalyst), aminomethylation of acrylamide polymers (in the presence of dimethylamine formaldehyde and catalysts).

Building 2 was a multi-use facility that housed Class I, Division II flammable materials and used compounds such as brominate methyl glutaronitrile, monomethyl amine, carbon disulfide, formaldehyde, ethylene diamine, sodium cyanate, methylene bromide, toluene, and hydrogen cyanamide, in addition to many others.

Buildings 4 and 14 were warehouses which store finished goods, raw materials, and empty containers.

A Community and Worker Right-to-Know form was completed by Henry Jecker, Plant Manager and filed with the NJDEP on February 25, 1988.

A preliminary SES was filed August 7, 1989.

September 22 P. Kaminski, UTC to K. Koneval, BASF. Response to BASF letter of July 13 and update of UTC ECRA status. UTC received conditional approval of 1985 Sampling Plan from NJDEP.

UTC suggested that BASF take immediate action on the concerns outlined in the July 19 letter, as part of BASF ECRA or RCRA programs. UTC noted that the stained soil on the pump house access road was surficial and clearly the result of recent activity while the site was owned by BASF, especially since the stain was not noted in any site visit by UTC or its subcontractor.

UTC noted that BASF stated that post-excavation samples around the Building 10 electrical transformers showed evidence of contamination, and noted that BASF should complete the work it began.

UTC stated that the presence of floating product in Well 5-88 suggested a recent source that may be related to BASF's RCRA storage facility.

UTC questioned the condition of the RCRA tank when excavated, location of transfer lines which served the tank, and spills associated with tank.

UTC questioned the BASF RCRA Part A and Part B permit for the Drum Storage Pad. UTC noted that required berms were not present around the RCRA storage pad; also the presence of possible drains in the base of the pad indicates that a spill, or spills, may have occurred in the past.

UTC also noted that site records indicated that the last fluorescein spill occurred during BASF ownership.

October 9 M. Rodburg, Lowenstein, Sandler, Kohl, Fisher & Boylan, representing BASF, outlined BASF's position on the groundwater conditions at the Hawthorne facility to W. Kramer, NJDEP. Mr. Rodburg stated that groundwater at the Hawthorne facility did not originate from the former RCRA waste tank. BASF expected to excavate the UST to the extent previously approved at the Bound Brook location, and take post-excavation samples.

October 16 ECRA Decommissioning and Demolition Report, O'Brien and Gere.

UTC entered into an ACO with NJDEP when it sold its Hawthorne Inmont facility to BASF on August 21, 1985. The BASF ECRA plan was submitted after BASF closed the Hawthorne facility on November 26, 1986. BASF operated the plant for 15 months.

BASF submitted an ECRA plan for decommissioning structures associated with BASF manufacturing operations. BASF operations were not included in the UTC ECRA plan. The purpose of the decommissioning and demolition program was to prepare the active buildings for closure in compliance with ECRA.

The decommissioning program addressed potential contamination which resulted from processes within active buildings prior to closing. It encompassed equipment and surface cleaning, sewer cleaning, materials and surface decontamination, building demolition, and recycling of concrete. BASF focused on removal of residuals and contaminants from buildings and equipment which it planned to demolish, to prepare the property for lease or sale.

Steam cleaning, hydroblasting, and sand blasting were used to decontaminate (remove free residual and stains) buildings which were active prior to closure. O.H. Materials performed the decommissioning program. Decommissioning/demolition began on June 1, 1988 and was completed by March 10, 1989.

Twenty-two buildings required decommissioning; eleven were demolished after decontamination was complete. Asbestos was removed prior to demolition. Wastes were stockpiled and classified to assure compliance with federal and state hazardous waste regulations and Passaic County regulations (solid waste flow requirements), and transported off-site.

BASF completed the activities and requested a Negative Declaration as part of the Decontamination/Demolition report.

The report notes (p. 3-1) that bituminous pavement was placed over building foundation footprints and surrounding areas, to minimize any hydrogeological impact from BASF's decommissioning activities. Pavement included a 6-inch base aggregate, a 4-inch bituminous concrete base course, and a 2-inch wear course ( $k = 1 \times 10^{-4}$  to  $1 \times 10^{-7}$  cm/sec).

**Demolition** (no dates provided)

- Building 4: Flushed bases (aliphatic and aromatic hydrocarbons) preparation and packaging:
  - process piping
  - weigh scale pits
  - solvent lines
  - residual product
  - process equipment
  - storage tanks
  - floor drains
- Building 6: Pigment Synthesis and Filtration:
  - below grade sumps
  - dichlorobenzidine tanks
  - acid brick flooring
  - dust collection systems
- Building 6A: Pigment Presscake Drying:
  - belt dryer
  - miscellaneous equipment
- Building 7: Pigment Blending:
  - blenders
  - miscellaneous equipment
- Building 11: Sub-Electrical Services:
  - PCB-contaminated (less than 500 ppm) transformers
- Building 17: River Water Pump House:



- pumps
  - miscellaneous equipment
- Building 18: River Water Filter House:
  - water treatment tanks
  - filter beds
  - piping
- Building 24: Surplus Equipment Storage and Former Maintenance Shed:
  - floors
  - miscellaneous equipment
- Building 25: Pilot Plan:
  - vessels
  - dryer trucks and trays
  - piping
  - acid brick floor
  - floor drains
- Building 27: Varnish Tank Storage:
  - varnish tanks
  - residual product
- Building 31: Ice Plant:
  - freon tanks

Note: Building 6A, 7, and 11 shared common walls and flooring with Building 6 and were decommissioned and demolished as part of Building 6.

### **Decommissioning**

- Building 1: Offices:
  - no areas of environmental concern were identified in this building

- Building 2: Laboratories:
  - laboratory benches
  - miscellaneous equipment
- Building 3: Raw Material, Intermediate Storage, and Maintenance:
  - floor stains
  - weigh scale pits
  - miscellaneous equipment
- Building 8: Boiler House:
  - asbestos pipe insulation
- Building 9A: Ink Dispersions:
  - dust collection systems
  - floor drains
- Building 9B: Employee Services:
  - locker room area
- Building 10: Main Electrical Service:
  - areas to be addressed by UTC (not part of original UTC ECRA program)
- Building 12: River Water Pump House:
  - no areas of environmental concern
- Building 13: Gravity Sprinkler Tank:
  - no areas of environmental concern
- Building 22: Vacuum Pump:
  - concrete sump

- Building 30: Warehouse and Shipping:
  - ink storage tanks
  - storage racks
  - floor stains
  - weigh scale pit
- Sewers: all process and sanitary sewers lines (p. 3-6)

A total of 4,704 cubic yards of hazardous waste solids and 71,500 gallons of hazardous waste liquids were removed from the site under the BASF ECRA cleanup. The hazardous waste stream consisted of plugged lines, laboratory equipment, ductwork, miscellaneous equipment, acid bricks, concrete from Building 7, sulfuric acid residue, drain sludge solids, drain liquids, Building 30 ink, hydropneumatic tank liquid, PCB ballasts and transformers with oil, and varnish pit sludge.

A total of 10,300 cy of non-hazardous debris was removed from the site as part of the BASF ECRA cleanup. The material included scrap steel/metal, concrete building rubble, and ID-27 waste (wood, fiberglass, miscellaneous debris).

November 10 K. Koneval, BASF, provided P. Kaminski, UTC, with information that UTC requested: Inmont Corporation - Notification of Hazardous Waste Activity (generator, TSD) (K086 D00S, U220, U239 -dated 7/24/80).

December 11 Remedial Action Work Plan, Former Inmont Corporation Facility, Hawthorne, N.J. Prepared by Hart Associates.

The Work Plan summarized physical and chemical data from previous investigations, and presented methods for soil and groundwater remediation.

Soils were collected from test borings, test pits, and surface locations from various areas around the plant. Groundwater samples were also obtained.

Nitrobenzene concentrations in the overburden aquifer were highest in the southern portion of the plant, near MW 2-84 (29,000 ppb) and MW 4-84 (31,000 ppb); elevated concentrations were reported near MW 6-85 (13 ppb). Aniline concentrations were highest near MW 3-84 (45,000) just west of the ditch which discharges to the Passaic River. Chlorinated compounds (such as trichloroethene) showed elevated concentrations near MW 1-82 (7 ppb) and MW 6-85 (5 ppb), in

the central area of the facility, and along the western property boundary (MW 8-85; 38 ppb).

Nitrobenzene concentrations ranged up to 500,000 ppb in the bedrock aquifer in the south-central portion of the site (MW-4). The western site boundary also showed elevated concentrations (BR 8-85). Aniline concentrations ranged up to 24,000 ppb (BR 3-84), in the southern portion of the site. Trichloroethene (and other chlorinated compounds) were found along the northern (95 ppb), southwestern (BR 12-89- 53 ppb), and southeastern (BR2-84- 33 ppb) property boundaries.

A summary of known discharges to the soil and groundwater at the Inmont facility is also included in the document (Table 11).

December 12 Supplemental Sampling Plan and Supplemental Sampling Plan Addendum Results Report for the Former Inmont Facility, Hawthorne, N.J. Prepared by Hart Associates.

The Supplemental Sampling Plan and Addendum (SSP and SSPA) was written to address data gaps concerning several suspected source areas. It involved soils data collection, since previous information from the Inmont facility was limited to surficial samples; no vertical delineation was conducted.

The SSP was implemented beginning February 27, 1989; field work was completed August 3, 1989. The investigation included drilling 19 soil borings, the installation of three additional monitor wells in the southwest portion of the site, and conducting aquifer and geophysical testing to evaluate bedrock and groundwater flow characteristics.

Based on NJDEP comments, a Supplemental Sampling Plan Addendum (SSPA) was prepared. The SSPA included the installation of one additional overburden monitor well, groundwater sampling for selected parameters from certain wells and additional soil sampling. Field work was conducted between September 14 and October 19, 1989.

(Conclusion illegible)

Table 11

SUMMARY OF KNOWN POTENTIAL DISCHARGES  
TO SOIL AND GROUNDWATER  
FORMER INMONT FACILITY

Area*	Contaminant(s)	Description
Former Drum Storage Areas	Sulfuric Acid	Sulfuric acid was used in solvent based reactions; a number of leaky drums were reported to have been buried in several former drum storage areas.
Quinizarin Reaction Area	Sulfuric Acid Phthalic Acid	Spill outside of former Quinizarin Reaction Area which involved sulfuric acid and phthalic acid by-products; exact quantities of spills not determined.
Drainage Ditch	9% Red Lake C	March 13, 1979 - Pigment found on banks of drainage ditch; cleaned by maintenance personnel.
Drainage Ditch	Paint	August 8, 1979 - Some paint was discharged into drainage ditch; removed by skimming of trench; EPA reported cleanup to be satisfactory.
Fuel Oil Storage Tank Containment Area	Fuel Oil #6	<p>March 21, 1977 - Approximately 400 gallons spilled and reached the drainage ditch during filling of storage tanks; a boom at end of the ditch restricted flow into Passaic River; drainage ditch water vacuumed by Standard Spill, Inc.; banks cleaned by maintenance personnel.</p> <p>May 23, 1978 - 200 gallon spill in storage tank containment area; cleaned up by Clean Venture, Inc.</p> <p>May 23, 1978 - Spill of unknown quantity which reached drainage ditch - treated by same method as March 21, 1977 spill.</p> <p>March 15, 1979 - Storage tank overflowed - restricted to containment area</p> <p>March 26, 1982 - 3000 gallons were spilled in storage tank containment area; Olsen and Hassold retained by Inmont to clean up spill</p>
Tank Farm 1	Nitrobenzene Aniline Other BN Compounds	Leaked from Tank Farm 1 which has since been excavated
Tank Farm 2	Unknown Sludges	Excavation of Tank Farm 2 resulted in the spilling of unknown sludges from tanks upon removal
Construction Debris Area	Industrial Materials	Weidman Company was reported to have dumped debris along the southern boundary of the facility. It is not known what materials constituted this debris.

\* See Figure 1-2 for locations of these areas.

Source: Fred C. Hart, Associates December 11, 1989

1990

844230258

**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1990**

**844230259**

1990

January Calgon Corporation, Report on Interim Remedial Measures, Hawthorne, N.J. GeoTrans, Inc.

Activities included concurrent sampling of the South Wagaraw Well Field and monitor wells at the Metasol Plant, and an attempt to locate and seal all abandoned bedrock wells at the Metasol facility. Samples were to be analyzed for VOCs, BN/AEs, and heavy metals (lead, mercury, arsenic).

Chemical constituents in the groundwater in July 1989 included benzene, toluene, TCE, tetrachloroethane, chlorobenzene, ethylbenzene, 1,1 dichloroethane, 1,2 dichloroethane, vinyl chloride, methylene chloride, 1,3 dichlorobenzene, 1,4 dichlorobenzene, 1,2 dichloroethene, 2,4 dimethylphenol, arsenic, and mercury. The number of unidentified peaks ranged between 0 and 26 (MW-1).

The Weidman Silk Dyeing wells could not be located. The report stated that D&M conducted a program to locate the wells but was unsuccessful. D&M (1979) did find Well no. 4 which was subsequently sealed with concrete.

Soil samples obtained from an excavation pit showed:

- TPH concentrations of 6,793,000  $\mu\text{g/kg}$ ;
- Mercury - 12,700  $\mu\text{g/kg}$ ;
- Arsenic - 11,900  $\mu\text{g/kg}$ ; and
- Lead - 481,000  $\mu\text{g/kg}$ .

Since heavy fuels were not stored/used in this area by Calgon, the presence of the contaminants was attributed to "discreet material" brought to the site from outside the area.

January 11 J. DeFina, NJDEP, notified K. Koneval, BASF, that ISSE had not received Decommissioning sampling data. The information was past due (January 4, 1990), and BASF was in violation of ECRA regulations.

February 28 Cleanup Plan for Inmont Corporation Facility, Hawthorne, New Jersey. Prepared by Hart Associates. ECRA Case No.: 85563



The cleanup report included:

- Site history, site geology, and site hydrogeology.
- Soils: Hart conducted two soil and groundwater sampling programs - May through July, 1988, and February through August, 1989. The results were included in the ECRA Sampling Plan Results (Hart, 1989) and the Supplemental Sampling Plan and Addendum Results (1989).

Soil samples were collected from thirteen areas listed below:

1. Excavated Tank Farm No. 1: Hart reported that the UST at this location stored methylene chloride and toluene. Total VOC concentrations (soils) up to 255 ppm were found. VOCs included methylene chloride, and toluene. Chlorobenzene, ethylbenzene, xylene, 2-butanone, acetone, and styrene were also present at significant concentrations.

Total base neutrals, including nitrobenzene, 1-2, 1-3, and 1-4 dichlorobenzene, and 1,2,4 trichlorobenzene, ranged in concentration from 1900 to 2550 ppm.

TPH concentrations ranged from 1400 ppm to 14,000 ppm. Hart suggested that the contamination may be the result of no. 6 fuel oil spills from the containment area north of Tank Farm 1.

Mercury was present in one sample at a concentration of 1.1 ppm.

2. Excavated Tank Farm No. 2: A total of 15 subsurface soil samples were obtained. Only ethylbenzene showed significant concentrations of VOCs (53 to 81 ppm); soil depths were generally below 6 feet.

TPH concentrations ranged between 10 ppm and 18,000 ppm.

3. Fuel Oil Storage Tank Containment Area: A total of seven soil samples were collected. Methylene chloride (10 ppb) was detected in one sample. The base neutral compound, bis-2-ethylhexyl phthalate, was detected at concentrations between < 1 ppm to 67 ppm.

PAHs were detected in one sample; phenanthrene (0.56 ppm) and 2-methyl naphthalene (1.1 ppm) were present.

TPH concentrations ranged between 35 and 50,000 ppm, and may have been associated with spills of No. 6 fuel oil.

4. Sanitary Sewer (Parshall Flume Area): No VOCs or BNs were detected.

5. Construction Debris Area: Six test pits were excavated in 1988; no disposal activity was noted. Construction debris (brick, glass, slag, etc.) was found in some test pits. Methylene chloride was the only VOC detected (0.003 to 0.011 ppm).

Hart reported that only cadmium (3.0 and 3.1 ppm) exceeded NJDEP ECRA Cleanup Guidelines.

6. Quinizarin Reaction Vessel Area: The report stated that trace concentrations of two acid extractables, parachlorophenol and phthalic acid, remained in the surface soils in a relatively small area have not migrated vertically downward into deeper portions of the soil.

7. Drainage Ditch: Four surface soil samples were collected from the drainage ditch in 1988; the VOCs methylene chloride (0.020 ppm) and trichlorofluoromethane (0.009 ppm) were present.

Nine base neutral compounds were present in concentrations varying between 12 ppm and 75 ppm. They were phenanthrene, fluoroanthene, pyrene, bis-2-ethylhexyl phthalate, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(a)anthracene, chrysene, and di-n-octyl phthalate. Total base neutral concentrations from soils obtained from the ditch ranged from 169 ppm to 406.9 ppm. Generally, compounds showed an increase in concentration in the downstream direction of the ditch; however, phthalates showed a decrease in concentration in this direction.

TPH concentrations ranged between 200 ppm and 5800 ppm.

The report noted that there were two known releases of fuel oil to the drainage ditch in 1977 and 1978, and Hart suggested that these two spills were probably associated with the elevated concentrations of TPH and base neutral compounds.

8. Former Drum Storage Areas: A total of 9 samples were obtained from this area during the 1988 sampling event - one surface sample from each

of the four former drum storage areas and one sample from each of five areas associated with black-topped strips (where drums were reported to have been stored).

Base neutral compounds were detected between 1 ppm and 8 ppm. Hart reports that the three most prevalent compounds included phenanthrene, fluorene, and pyrene.

Cadmium, chromium, copper, nickel, zinc, arsenic, lead, and mercury were detected in the soil adjacent to the former drum storage areas; mercury was present at concentrations of 2.6 ppm and 3.6 ppm, which exceed ECRA guidelines.

VOCs were not detected in any of the samples obtained from the black-topped strip area; base neutral compounds were detected, but Hart suggested that the macadam may be the source of the contaminants.

Resampling during the 1989 investigation included obtaining deeper surface samples and the installation of three soil borings. The volatiles ethylbenzene (67,000 ppb) and xylene (400,000 ppb) were found in two surface samples.

Base neutrals were also detected in samples obtained from the soil borings from the black-topped strip area. Naphthalene (5800 ppb), 2-methylnaphthene (2200, 5300 ppb), phenanthrene (5100 ppb) and trace amounts (below contract detection limits) of pyrene, phenanthracene, and bis-2-ethylhexyl phthalate were reported.

Petroleum hydrocarbons were found in one sample at concentrations of 510 ppm (2 to 4 feet) and 1400 ppm (8 to 10 feet).

Hart noted that the former drum storage areas were not used to store RCRA wastes.

9. Former Transformer Location: A total of two samples were collected and sampled for PCBs. One sample showed the presence of PCBs (1.2 ppm).

10. Mechanical Surplus Storage Area: The mechanical surplus storage area, located near the southeastern corner of the Site, was sampled.

Analysis did not show the presence of VOCs. Base neutrals were detected, but none exceeded 1 ppm.

11. Storm Sewer Discharge Area: The storm sewer discharge point was located in the southwestern portion of the facility. A total of three soil samples were obtained from this area. VOCs were not detected. Total base neutrals (one sample only) were detected at 2 ppm. TPH ranged between 26 ppm and 240 ppm.

12. Southern Perimeter: Fourteen borings were installed along the southern perimeter of the site. Nineteen samples were collected from depths ranging between two and ten feet.

Methylene chloride and acetone were found in most of the soil samples; however, Hart states that the methylene chloride was most likely associated with laboratory contamination. Toluene was also found, but at concentrations below the detection limit.

Nitrobenzene (470 ppb) and bis-2-ethylhexyl phthalate (up to 510 ppm) were reported.

13. Background: Samples were obtained from the front lawn of the Inmont facility. VOCs and PCBs were not detected in the soil sample; a total of 4.4 ppm BNs were reported.

Groundwater samples were collected from 18 monitor wells screened in the overburden and from wells screened in the bedrock aquifer.

Overburden: Thirteen of the eighteen overburden wells contained volatile organic compounds. Toluene (up to 3000 ppb), ethylbenzene (approximately 190 ppb - below contract detection limit), chlorobenzene (1200 ppb), and dichlorobenzene (2100 ppb 1,2 dichlorobenzene) were reported to be present in the groundwater in the highest concentrations. Trichloroethene and tetrachlorethene were also found at low concentrations.

Base neutral compounds were detected in 10 of the 18 overburden monitor wells. Nitrobenzene (31,000 ppb) and aniline (45,000 ppb) were present in the highest concentrations; 1,2,4-trichlorobenzene (780 ppb) was also found.

Based on distribution patterns of the various contaminants present in the groundwater of the monitor wells tested, Hart suggested an off-site source for compounds detected along the western boundary of the site.

The report stated that plume patterns in the overburden aquifer were related to potential source areas of the chemicals detected at the site. The area of the highest VOCs was near Tank Farm 1. These tanks contained chlorinated benzene compounds, xylene, toluene, and nitrobenzene. Groundwater movement probably accounted for the migration of the compounds away from Tank Farm 1. Surface spills in other parts of the facility may have accounted for the presence of substituted benzene compounds.

Bedrock: The distribution of compounds in the bedrock aquifer was described as being more complicated than the overburden. The bedrock aquifer was described as consisting of an unknown number of transmissive zones with high permeability; these transmissive zones are oriented parallel to bedding planes in the Brunswick Formation, and these zones may be connected to other water producing zones by vertical joints.

The bedrock aquifer was subdivided into three intervals: the upper, intermediate, and lower zones. The degree of vertical connection, if any, between the zones was not known.

VOCs found in the bedrock wells were similar to those found in the overburden wells, but at higher concentrations. Overall, nitrobenzene, aniline, chlorobenzenes, and toluene were centralized in the southern and southwestern portions of the site near the bedrock divide; concentrations generally decrease to the north and east.

The report noted that chlorinated ethane and ethene compounds were generally found in the southeast corner of the site, along the northern site boundary, and in the southwestern portion of the facility.

Hart summarized that the overburden aquifer was probably not the source of the compounds found in the bedrock aquifer. Based on the distribution pattern of the chlorinated ethanes and ethenes, Hart suggested that an off-site source for these contaminants in the bedrock aquifer was possible. Nitrobenzene, aniline, chlorobenzene, and toluene appeared to have an on-site source.

The report also included chapters discussing media cleanup levels, proposed remedial actions, and cleanup plan implementation.

March 20 D. Webster, BASF, forwarded comments prepared by Dennis Colton of Geraghty and Miller and Richard Cawley of O'Brien & Gere to P. Kaminski, UTC. The comments addressed issues associated with the proposed cleanup plan for the Inmont Facility, Hawthorne, New Jersey. The comments included:

- Nitrobenzene and aniline were not detected in soil samples but were found in high concentrations in the bedrock aquifer. Source of contaminants was not known;
- Nitrobenzene and aniline may be associated with the Weidman Silk Dyeing Wells. Hart Associates stated in their Cleanup Plan that seven Weidman wells were tentatively located by a magnetometer survey. The seven wells were sealed in February 1990 (personal communication, P. Lawrence, McLaren/Hart and A. Mario, Baker Environmental, Inc., February 3, 1992);
- BASF representatives expressed concern that an insufficient number of borings were installed to delineate the area requiring remediation;
- Hart designed a remedial pumping program for the overburden which consisted of three wells pumping at 2 gpm, and one well pumping at 5 gpm. Since Hart used an assumed hydraulic conductivity, BASF felt that 2 gpm was too low and would be insufficient to define the capture zone of the wells because no aquifer test had been conducted;
- G & M pumped the bedrock aquifer in 1984 and showed that hydraulic control of the overburden could be achieved by pumping the bedrock aquifer;
- G & M conducted a 48-hour pumping test (180 gpm) of the bedrock aquifer in 1984. Groundwater flow was induced along the north, east, and south boundaries - since there were no wells along the western boundary of the site, effects of pumping could not be determined in this direction. They suggested that the rate could be reduced by one-third and still maintain the same hydraulic control;

- Hart proposed pumping a total of 105 gpm from 5 bedrock wells but also stated that it was possible to pump one well at 105 gpm and hydraulically control the whole site;
- BR10-85 (bedrock well), located 300 feet south of the North Wagaraw Road well field, contained 20,000  $\mu\text{g/l}$  nitrobenzene. Hart suggested that pumping the well at 10 gpm would control the spread of contamination. However, Hart did not conduct field tests of this well, or the other four wells that were suggested as extraction wells (25 gpm total). Therefore, the pumping scheme suggested by Hart might not prevent off-site migration of contaminants;
- A groundwater divide was observed in the southern one-third of property in the bedrock aquifer by G&M and by Hart, based on water level data. They predicted a northward shift of the groundwater divide during pumping, out of the North Wagaraw Road well field influence. However, no field data were presented to support this conclusion;
- The Hart groundwater contour map was based on an incorrect G & M water level in the northwest portion of site;
- The commentators observed that at the time of the investigation, no bedrock pumping well was located on the north side of the property to produce groundwater flow away from the municipal well field;
- The depth of contamination was unknown;
- No information on metals concentration was presented;
- The State MCLs for several volatiles were exceeded (groundwater) at the site. These limits should be addressed;
- Additional comments from R. Cawley, O'Brien & Gere, centered around areas of concern, general cleanup levels, and delineation.

May 15

R. Wale, Project Manager, HART Associates forwarded results of soil samples collected from a Calgon excavation pile. The sampler attempted to collect biased sample. The mercury concentration was 710,000 ppb. Methylene chloride and metals were also detected above method detection limits ( $\mu\text{g/kg}$ ).

- May 9, 29 Duplicate letter (?) from K. Koneval, BASF to C. Neuffer, NJDEP. BASF signed and submitted negative declaration forms (1A and 1B) and a \$500.00 fee.
- May 21 SSPA II Cleanup Plan for Inmont Corporation Facility, Hawthorne, N.J., ECRA Case No. 85563. Prepared by Hart Associates, May 21, 1990.

Hart prepared this addendum to address comments made by NJDEP on October 20, 1989. Issues associated with the NJDEP comments were not included in the February 1990 main Cleanup Plan Submission, since the comments did not entail a major scope change. Both the SSPA II Results Report (December 12, 1989) and this SSPA II Cleanup Plan (addended) were addenda to the February 1990 Cleanup Plan.

This SSPA II Cleanup Plan presented and evaluated remedial options, and highlighted those which were most appropriate for site cleanup. The addendum discussed site characteristics, a summary of environmental concerns, cleanup levels, proposed remedial actions, implementation plan, and a schedule of cleanup implementation.

This cleanup plan stated that seven of the nine Weidman wells were located by Hart and sealed in March 1990 according to NJDEP specifications. Hart states that a discussion of the abandonment of the seven Weidman wells was included in the February Cleanup Plan; however, no discussion of the location or abandonment of the wells was included in this document.

The Site History included in this document showed the following additional information:

- February 20, 1990: NJDEP conditional approval of SSPA II
- March 13-16 and  
April 4, 1990: SSPA II Sampling Conducted

No additional or conflicting information was provided for site geology or hydrogeology.

Five additional areas of concern were identified:

- Pump House Access Road: Hart obtained two soil samples from one boring along the pump access road and analyzed for BN/AE +10, plus



phthalic acid, and parachlorophenol. Pyrene, phenanthrene, fluoranthene, chrysene, benzo(g,h,i)anthracene, and benzo(k)fluoranthene.

- Transformers Near Building 10: Six soil samples were obtained from three soil borings near Building 10 and analyzed for PCBs. PCB concentration decreased with depth; Arochlor 1260 was present in five samples and ranged in concentration between 0.33 ppm and 54 ppm.

- Tank Farm No.2 Transfer Lines: Six soil samples and one duplicate were obtained around the Tank Farm No.2 transfer line area from the surface to a depth of two feet. Samples were analyzed for PP+40.

VOCs were detected in six of the seven samples. They included xylenes, ethylbenzene, methylene chloride, and acetone.

BN/AE compounds were detected in five samples. They included bis-2-ethylhexyl phthalate, naphthalene, phenanthrene, pyrene, and 2 ethylnaphthalene. Total base neutrals ranged between ND (not detected) to 19,700 ppb. No acid extractable compounds were detected.

Mercury ranged between 0.11 ppm to 7.3 ppm.

PCBs (Arochlor 1260) were present in all seven samples; concentrations ranged between 6.3 ppm and 150 ppm.

Total cyanide and phenols were not detected in any sample.

- Fluorescein Residue Area: Visual observation of continuous split spoon samples obtained from two soil borings showed no visual evidence of fluorescein dye.

- Resin-Like Substance Area: Three soil samples and one duplicate sample were collected from three soil borings in this area. The samples were analyzed for VOCs, BNs, and TPH.

Acetone, ethylbenzene, and xylenes were detected in the samples. Total VOCs ranged up to 3452  $\mu\text{g/kg}$ . Five base neutral compounds (phenanthrene, fluoranthene, pyrene, chrysene, benzo(b)fluoranthene, benzo(a)pyrene, and bis-2-ethylhexyl phthalate) were found in two samples. Total base neutral compounds ranged up to 3180  $\mu\text{g/kg}$ . TPH concentrations ranged between not detected to 35,000 mg/kg.

- May 23 J. Hamilton, Acting Assistant Director, Enforcement Element, Division of Water Resources, NJDEP, forwarded a copy of an Amendment to the Calgon Administrative Consent Order to R. Meyers, Calgon Corporation. ACO/ECRA coordination.
- May 23 Revised Metasol Plant RI Work Plan submitted to NJDEP. Reflected July 1989 NJDEP comments and aerial photographs.
- July 19 K. Doyle, Attorney for UTC, informed J. Poff, Senior Counsel, BASF that the Calgon Corporation denied approval for power interruption to the BASF facility to enhance safety of contractor crews.
- August 14 M. Justiniano, Case Manager, BEECRA, NJDEP provided R. Goldman of Drinker, Biddle and Reath, with a Draft Sampling Plan Approval for the Calgon Corporation site, ECRA Case No. 89533. Provided comments on soil conditions, General Site Investigation, Areas of Environmental Concern, and other technical concerns.
- October 20 D. Webster, BASF, to P. Kaminski, UTC, request for meeting prior to field activity commencement.
- November 6 Amendment to Calgon Corporation ACO. Letter from R. Goldman, Attorney, Drinker, Biddle and Reath to J. Hamilton, Acting Assistant Director, ECRA. R. Goldman drafted a two page amendment to ACO noting transfer of case jurisdiction from DWR to ISEE.
- December 20 W. Ingersoll, Hydrogeologist through S. Urbanik, Acting Northern Section Chief reported to J. Mikulka, Region Chief, Northern Bureau of Regional Enforcement that Pan Chemical Corporation was in non-compliance with a directive to install nine monitoring wells by February 1, 1990. Because the site is 1,000 feet upgradient of the North Wagaraw Road well field, it was of high concern.

Pan Chemical Corporation had ten underground storage tanks removed and post-excavation soil samples revealed volatile organic contamination. Volatile organic contamination was also found near the vat cleaning area. In all, 27 tanks (10 removed in 1987) contained the following substances: D.O.P., toluene, 1,1,1 trichlorethane, butyl acetate, butyl alcohol, isopropanol anhydrous 99%, D.I.D.P., acetone, xylene, methyl isobutyl ketone, lactane, Solvesso 100, toluene/methyl ethyl ketone mix, methyl ethyl ketone, diesel fuel, and no. 2 fuel oil.

Wells at the facility that have been sampled contain the following contaminants: benzene, toluene, 1,1-dichloroethane, 1,1,1-trichloroethane, n-nitrosodiphenylamine, and bis-2-ethylhexyl phthalate. Total concentrations at the site ranged from not detected to 228 ppb. At this time, it was not known if any or all of these contaminants would be found in the municipal wells.

During the installation of monitoring well MW-6, rubber material was encountered between 2 and 8 feet along with a strong fuel odor. During ground water sampling, a black tar like substance was noted in the well. However, the sample was not analyzed. Also, during the excavation of a UST containing MEK and toluene in December of 1989, a sheen on the water was noted along with a strong odor. The tank was described as pitted. A site map with monitoring well locations was attached to the memo.

December 21 D. Webster, BASF provided D. Rainey, Borough of Hawthorne with an update on BASF activity. At this point in time, BASF stated that they had completed their obligations under ECRA (no mention of RCRA) including dismantling of buildings, removal of contaminated soil, and paving of significant portions of the site. UTC had conditional approval of its Cleanup Plan. Soil removal (February 1991 - 3 to 4 month duration - included removal of ASTs), bench scale treatability studies, and pumping tests were scheduled. Final design of the groundwater extraction and treatment system was scheduled for mid- 1991 with implementation by the end of 1991.

December 27 R. Meyers, Calgon Corporation, notified J. Miller, Section Chief, Discharge Investigation Section, BUST, NJDEP, that a subsurface concrete vault was discovered at the Metasol Plant, Hawthorne, N.J. The exact function of the vault was unknown, but may have been used as part of mercury processing activities. The vault was 16 feet wide by 14 feet long, and 6 feet deep; approximately 4.5 feet was below ground surface. At the time of discovery, the vault was filled with mercury-contaminated water (70 mg/l). M. Justiniano, NJDEP, BEECRA Case Manager was informed of the situation.



**Baker Environmental, Inc.**  
**May 29, 1992**

**Site History**  
**Former Inmont Facility**

**150 Wagaraw Road**  
**Hawthorne, New Jersey**

**Compilation Period: 1991**

**844230273**

1991

January 8      Work Plan for Remedial Investigation at the Metasol Plant, Hawthorne, N.J. GeoTrans, Inc. Information included in the RI Work Plan is outlined below.

On June 6, 1988 Calgon Corporation signed an ACO with the NJDEP concerning the Metasol Plant in Hawthorne. Under the ACO, Calgon agreed to conduct a remedial investigation (RI) of the site. A work plan outlining the RI was submitted on July 7, 1989 to the NJDEP - DWR. However, Calgon phased out operations prior to implementation of the RI. All manufacturing was expected to end by May 31, 1991. This action subjected the site to the requirements of ECRA. Therefore, the sampling plan was to meet the requirements of both the ACO and ECRA.

Site History

The Calgon Corporation's Metasol Plant includes 8.78 acres located at 200 Wagaraw Road, Hawthorne, N.J., immediately west of the Inmont property.

Prior to 1945, the site was owned by the Weidman Silk Dyeing Company and was undeveloped; aerial photographs from 1940 confirm this conclusion. GeoTrans reports that the land was allegedly used as a dumping ground for coal ash and wastes from the local dyeing industry in Patterson.

1945: Purchase of the 8.78 tract by the Metalsalts Corporation.

1947: Operations began - including the production of inorganic mercurial compounds.

1948: Production of organic mercurials began.

1949: Limited production of non-mercurial compounds begins.

1950: Major expansion of the facility. Several mercury recovery stills were constructed to recover mercury from used military batteries and other products. The stills were present at the site at the time the Work Plan was prepared.

Late 1950:  
Plant produces primarily non-mercurial compounds.

1966: Facility purchased by Merck and Company.

1968: Calgon purchased by Merck and Company.

1969: Production of inorganic mercurials ended; production of organic mercury compounds ended, except "Mist-o-Matic" - a seed disinfectant (possibly a "biocide")- which continued to be produced.

Early 1970's:

A 4000 to 5000 gallon spill of a 50% solution of sodium thiocyanate was spilled in front of Building No.2.

1974: Spill containment impoundment (dirt) constructed to capture releases associated with the DMDAAC process. A 1979 aerial photograph showed that the impoundment consisted of a berm along much of the southern end of the property. Spills of unknown quantities occurred within the impoundment.

1974: Production of DMDAAC (dimethyl diallyl ammonium chloride) and related polymers began.

1978: Production of "Mist-O-Matic" ended;  
Use of benzene (Building 2) ended;  
Metasol Plant transferred from Merck Chemical Division to Calgon Corporation.

June 1979:

Dames & Moore (D&M) - Phase I Groundwater Contamination Study, Calgon Site, Hawthorne, N.J. (no field work).

1980's:

Three tanks, located between Buildings 1 and 2, were removed. They were a 1000-gallon tank containing methanol, and two 500-gallon tanks which stored ammonia and isopropanol.

August 1980:

D&M - Phase II Hydrogeologic Investigation Conducted at the Calgon Plant Site, Hawthorne, N.J. Installed and pump-tested 7 alluvial (overburden) and 2 bedrock wells; obtained groundwater

levels from wells on 10 occasions, collected soil samples from well borings for mercury analysis.

1982: Spill containment impoundment (DMDAAC) eliminated.

March 1982:

D&M - Phase III Hydrogeologic Investigation conducted at the Calgon Plant Site, Hawthorne, N.J. Installed 4 overburden and 2 bedrock wells; pump-tested 5 of the 6 wells; measured water levels on 9 occasions; collected water quality data at all wells.

December 1985:

Bucek & Ebaugh - Hydrology of the Metasol Plant. Conducted pumping test or slug test on 14 of the 15 wells, measured water levels, collected water quality samples at all wells on three occasions.

1988: A 20,000-gallon tank containing allyl chloride was removed. The tank did not show signs of leakage, but some signs of deterioration were noted and the tank was removed.

July 1988:

GeoTrans, Inc. - Preliminary Remedial Investigation Report, Metasol Plant, Hawthorne, N.J. (no field activity).

October 1988:

Approximately 175 gallons of process liquor spilled directly onto the ground, adjacent to the underground storage tanks. NJDEP was notified. Calgon excavated approximately 10 cubic yards of soil contaminated by the spill; continued excavation suggested that contamination may have extended below a zone associated with the 175-gallon spill. Soil samples, associated with potential past leaks, were collected and analyzed for volatile organics, base neutrals, acid extractables, mercury, arsenic, and lead. Results were included in a January 1989 progress report.

September 1989:

A 1000-gallon gasoline tank was removed. Soil samples from the excavation were analyzed for TPH and BTEX. One sample showed 30  $\mu\text{g/kg}$  of benzene.



November 1989:

A 5000-gallon UST which stored no. 4 fuel oil was removed. Eight samples were collected from the excavation and analyzed for TPH. Four samples showed the presence of TPH; concentrations ranged between 147 mg/l and 2800 mg/l. The sample which contained 2800 mg/l was also analyzed for BNs and showed a concentration of 9.994 mg/l.

January 1990:

GeoTrans, Inc. - Report on Interim Remedial Measures. Obtained groundwater from on-site wells and the South Wagaraw Road well field (three wells); attempted to locate abandoned bedrock wells.

May 1990:

Installation of MW-16 adjacent to the former location of the 5000-gallon fuel tank, removed in November 1989. Two soil samples were obtained and analyzed. Mercury was present in concentrations up to 27,700  $\mu\text{g/kg}$ , arsenic to 3810  $\mu\text{g/kg}$ , lead to 11,800  $\mu\text{g/kg}$ , and TPH to 800,000  $\mu\text{g/kg}$ . Pyrene, methylene chloride, acenaphthene, phenanthrene were also detected. Methylene chloride was also detected in the field blank.

Groundwater was analyzed for VOCs and BNs. Only a trace of tetrachloroethene was detected; no floating product was observed.

December 1990:

GeoTrans, Inc. - Report on the Installation and Sampling of Monitor Well MW-16. Soil and groundwater sampling.

The report also noted that prior to 1973, cooling and air conditioning water was discharged to Lincoln Ditch and mercury recovery waste (spent battery casings and other items) was landfilled on-site. Initially landfilling occurred near the mercury stills and subsequently became incorporated into fill material used to fill low-lying areas of the site, south of the stills.

D&M reported that six USTs were active at the Metasol Plant. Two tanks (No.2 and No.4) store 11,500 gallons of fuel oil (No.6 fuel oil and diesel) and were not diked. The remaining 4 tanks were 20,000 gallons each and were diked. They contained allyl chloride, dimethylamine, monomethylamine, and liquid derived

from process stripping. The tanks were located in sloped bunkers filled with sand and gravel. Each tank had a sampling sump which was checked every five years; the bunker was checked daily for leakage. There were no reported problems with the tanks.

#### Geology/Hydrogeology

Based on information from the 16 onsite wells, D&M concluded that the bedrock appeared to be highest near the center of the site and displayed a ridge-like structure that trends northeast with slides sloping toward the northwest and southeast.

There was approximately 14 to 30 feet of alluvial deposits (overburden) overlying the bedrock. Sediments generally consist of silt, sand, and gravel. The natural sediments are overlain by one to nine feet of fill material consisting of sand mixed with debris containing brick, concrete, wood, and metal.

D&M stated that there are two aquifers: an unconfined overburden aquifer, and a confined bedrock aquifer. Depth to the water table ranges between 10 and 15 feet (bgs??) across the site. The Passaic River is a discharge area for both the bedrock and the overburden aquifers.

Hydraulic conductivities were estimated based on drawdown and recovery tests (D&M 1980, 1982; Bucek and Ebaugh, 1985) at each of the four monitor wells completed in the bedrock. Hydraulic conductivity in the bedrock aquifer of the northern portion of the site ranged between 0.04 and 1 ft/day. Hydraulic conductivity in the bedrock aquifer in the southern portion of the site ranged between 12 and 31 ft/day. Differences between hydraulic conductivity of the northern and southern portions of the site may be due to leakage from the overburden, or fracture density.

Transmissivity of the bedrock aquifer in the northern portion of the site ranged between 2 and 26 ft<sup>2</sup>/day; and in the southern between 23 and 657 ft<sup>2</sup>/day.

Hydraulic conductivity in the overburden aquifer was significantly higher in the southern portion (70 ft/d) than the northern portion (1 ft/d) of the site, the same pattern as the bedrock aquifer. The pattern in the overburden aquifer was probably due to differences in the origin and character of the alluvium between the northern portion of the site and the southern portion.

Groundwater flow appeared to flow towards the southeast. There was evidence of a groundwater divide in the northwest corner of the Calgon site, and groundwater may have been flowing to the northwest in this area. The D&M report noted that groundwater from the BASF site was flowing beneath the Calgon property in the vicinity of MW 6 and MW 8. D&M also suggested that at times, groundwater in the bedrock aquifer may have been flowing to the northwest.

#### Contamination Review

Mercury was present in both soil and groundwater. Concentrations of mercury in the soil varied with depth; they were considerably less in soils below the water table. Maximum dissolved mercury between 1984 and 1987 was greatest along the western property boundary, with much lower concentrations to the east.

A variety of VOCs had been detected in all wells at the Calgon property between 1979 and 1987. The most persistent and widespread include benzene, tetrachloroethane, trichloroethene, 1,1, dichloroethane, trans-1,2 dichloroethene, methylene chloride, and vinyl chloride. Except for benzene (and toluene), these compounds were not used at the plant.

The highest concentration of VOCs in the overburden aquifer (excluding benzene and toluene) was along the west property boundary at MW-6 (238  $\mu\text{g/l}$ ) and MW-15 (135  $\mu\text{g/l}$ ), and in the southeast at MW-1 (273  $\mu\text{g/l}$ ) and MW-7A (127  $\mu\text{g/l}$ ). The highest concentration of VOCs in the bedrock aquifer was at MW-2 (209  $\mu\text{g/l}$ ) along the eastern property boundary.

February 14 Report on the Installation and Sampling of MW-16, Metasol Plant, Hawthorne, N.J. GeoTrans, Inc.

D & J, Inc. removed a 5000-gallon UST which stored No. 4 fuel oil; the tank had been in use since 1945.

Numerous 1- to 2-inch holes were observed. Visual and olfactory evidence suggested that only soil directly beneath the tank (approximately 9.5 feet bgs) was contaminated.

Eight soil samples were collected and analyzed for TPH; the sample with the highest TPH was analyzed for BN/AEs (EPA 625). The excavation was lined with polyurethane, and the excavated soil was placed back into the excavation; the surface was graded.

The maximum TPH concentration was reported as 2800 mg/kg; this was deemed well below the minimum of 30,000 mg/kg for petroleum-saturated soils so soil removal was considered unnecessary. GeoTrans stated that this was consistent with requirements detailed by NJDEP for corrective actions at UST sites (NJDEP, 1989). NJDEP regulations required the installation of a downgradient monitor well within 10 feet of the former tank location to assess impact of the UST on groundwater.

A shallow (17 feet) 4-inch monitoring well (MW-16) was installed on May 16 and 17, 1990. The well was located 3 feet downgradient from the 5000-gallon UST excavation.

Two soil samples were analyzed for TPH; a maximum concentration of 800 mg/kg was detected. The BNs phenanthrene and acenaphthene, were also present. Groundwater showed the presence of tetrachloroethene, only. Based on analytical results, GeoTrans concluded that only the soils were affected by the UST contents and that the groundwater was not affected.

March 15 Cleanup Plan Addendum No. 2 for the Former Inmont Corporation Facility, Hawthorne, N.J. Prepared by McLaren/Hart Environmental Engineers.

NO ADDITIONAL INFORMATION (Table of Contents only).

March 19 Geophysical Investigation at the Calgon Corporation, Metasol Plant, Hawthorne, N.J. Prepared by ERM for GeoTrans, Inc.

A ground penetrating radar (GPR) study was conducted at the Calgon facility on January 30, 1991. The purpose of the investigation was to identify excavations or buried metallic objects (e.g., waste storage drums). ERM concluded that:

- Twenty-seven (27) buried metal anomalies were located in the area south of the plant, near Buildings 1, 2, and 4. The anomalies were dispersed equally over the site; depths ranged between 0.8 feet and 5.8 feet.
- Four metal objects were located in the parking lot area (north of Building 1); two of the four objects were known gas/electric lines.
- Two metallic-object anomalies were located east of Buildings 2 and 14, at the base of a large excavation (interpreted).

- Several distorted GPR anomalies were present at the site, and indicated the presence of crushed/eroded metal objects.
- Five excavation areas were defined at the Plant; fill orientation was determined for three of the five areas.
- All sediments south of the Plant exhibited chaotic reflection patterns which may have indicated multiple excavations or backfilling operations.
- Two GPR lines within the parking area (north of Building 1) showed strong reflections. These were interpreted as the interface between non-indurated coarse to fine sand and dense coarse to fine sand and gravel.

May 30 Letter of Negative Declaration from NJDEP to BASF. (Note: letter of declaration does not apply to RCRA units).

June 14 Letter to K. Miller, NJDEP, from D. Webster, BASF, concerning PCBs around transformers at Building 10, Inmont Facility. D. Webster noted that BASF would address soils within the transformer cage.

In 1983, UTC replaced three 200 KVA Askarel transformers with a 3-phase 250 KVA transformer containing 82.2 ppm of PCB. BASF tested the remaining transformers in 1987 and found that 7 of the 10 transformers contained PCB concentrations ranging between 82.2 and 199 ppm; 3 of the 10 transformers did not contain PCBs. Retesting (the number of transformers was not specified) in 1989 indicated that PCB concentrations ranged between 20.5 and 376 ppm. Concentrations of PCB as high as 4074 ppm were found in soils around the transformers; significant (concentrations not reported) concentration of TPH was also noted.

BASF suggested that the concentrations of PCB in the soil indicated that soil contamination predated BASF operation.

BASF's letter of Negative Declaration was attached to the correspondence.

July 10 D. Pompeo, Acting Chief, ECRA, formally notified R. Goldman, Calgon, that SAP and RIWP (January 1991) was approved. The approval included the SAP Addenda (February 26, 1991 and April 3, 1991) and responses to the Draft SAP and RIWP (May 3, 1991).

Site History-Inmont Facility  
Hawthorne, Passaic County, New Jersey  
Compilation Period: 1991

- July 19 K. Doyle, Attorney, UTC, requested J. Poff, Senior Counsel, BASF, that BASF shut power for a limited time to enhance safety of contractor crews involved in soil removal from the former Tank Farm No. 2 area.
- July 30 Letter from Beryl Kuder, Assistant Counsel, Environmental Law, Merck and Co. Inc., to M. Justiniano, NJDEP. Merck received NJDEP letter approving January 1991 Work Plan. B. Kuder expressed concern about proposed schedule.
- October 16 R. Meyers, Plant Manager, Calgon Corporation, submitted a copy of the Sampling and Analysis Plan (SAP) for the Calgon Metasol Plant, Hawthorne, N.J. prepared by Dunn Geoscience Corporation.

The SAP outlined the methods that would be used to perform characterization and waste classification of building construction materials and process plant materials and equipment, so that debris resulting from the decommissioning/demolition of the plant and equipment could be properly determined. Potential health risks to both demolition workers and the surrounding community from cleanup and demolition were also to be addressed. Merck and Co., Inc. intended to demolish and dispose of the entire plant and all equipment remaining at the site, with the exception of Building No. 14. Only foundations and below-grade concrete slabs would be left in place. The SAP and the resulting report would only address building interiors and related plant materials and equipment to be removed from the site.